

REPUBLIC OF THE PHILIPPINES
SENATE
PASAY CITY

Impeachment Court

IN THE MATTER OF:

Case No. 004-2026

THE IMPEACHMENT TRIAL OF VICE
PRESIDENT SARA ZIMMERMAN
DUTERTE,

X-----X

PRE-TRIAL BRIEF¹

Respondent Vice President Sara Z. Duterte, through counsel, respectfully submits her Pre-Trial Brief, as follows:

Statement of the Case

On July 25, 2025, the Supreme Court declared the 2025 Articles of Impeachment transmitted by the House of Representatives² of the 19th Congress to the Senate **unconstitutional** and deemed **null and void *ab initio***.³ On January 28, 2026, the High Court denied with finality the HOR's Motion for Reconsideration, with a reminder that:⁴

Impeachment is a powerful democratic process to call out corruption and grave abuse.

But impeachment can be abused. It has never been imagined in our basic law as a tool for the powerful to maintain the status quo, to maintain a political faction in power by silencing independent, strident, and insistent critics. Impeachment should never be abused to maintain the hegemonic dominance of greed by shaming those who occupy high government positions into preventing them into doing what they were sworn to do.⁵

The impeachment bid against the Vice President, however, did not stop. On February 2, 2026, two Verified Complaints were filed by the groups led by the former

¹ This Pre-Trial Brief is being filed without waiver of the respondent's fundamental and other objections, as well as any questions that the respondent may have on issues affecting the constitutional requirements under Article XI.
² Hereafter, "HOR"
³ See dispositive portion of the Decision dated July 25, 2025 in Duterte v. House of Representatives, et al., G.R. Nos. 278353 and 278359, p. 95
⁴ See dispositive portion of the Resolution dated January 28, 2026 in Duterte v. House of Representatives, et al., id., p. 47
⁵ Resolution dated January 28, 2026, Duterte v. House of Representatives, et al., G.R. Nos. 278353 and 278359, p. 46

Representative Francisca Castro, et al.,⁶ and Francis Joseph Aquino Dee, et al.⁷ On February 5, 2026 the HOR Secretary General forwarded those Complaints to the Speaker of the House.

On February 9, 2026 a third impeachment complaint was filed against the Vice President by Fr. Joel Saballa, et al.,⁸ which was forwarded by the Secretary General to the Speaker on the same day. On February 18, 2026, another impeachment complaint was filed by Atty. Nathaniel Cabrera,⁹ which was forwarded by the Secretary General to the Speaker the following day.

On February 23, 2026, all these four Impeachment Complaints were included in the Additional Order of Business of the HOR plenary session, which then purportedly referred said complaints to the Committee on Justice.

During the first hearing of the Committee on Justice on March 2, 2026, the complainants in the Dee Complaint withdrew said complaint, which the committee approved. On the same day, the Committee on Justice also set aside the Castro Complaint for being violative of the One-Year Bar rule under Section 3(5), Article XI of the Constitution.

Thereafter, the Committee on Justice conducted hearings¹⁰ to allegedly determine the sufficiency in form, substance, and grounds, of the remaining Saballa and Cabrera Complaints, as well as the existence of probable cause.

On March 16, 2026, the Vice President filed her Consolidated Verified Answer *Ad Cautelam* to the remaining Saballa and Cabrera Complaints. In response to the Letter dated March 19, 2026 of Rep. Gerville Jinky Luistro, the Chairperson of the Committee on Justice, the Vice President sent through counsel a Letter dated March 24, 2026 stating her jurisdictional objections to the committee's "mini-trial."

On April 1, 2026, the Vice President also filed a Petition for Certiorari and Prohibition with the Supreme Court raising grave constitutional questions. This Petition remains pending to this day.

On May 5, 2026, the House Committee on Justice Committee Report No. 261 recommended the adoption of House Resolution No. 989 setting forth the Articles of Impeachment. On May 11, 2026, the HOR voted to impeach the Vice President and

⁶ Hereafter, the "Castro Complaint"; the Castro Complaint was endorsed by Reps. Antonio Tinio, Sarah Jane Elago, and Renee Co

⁷ Hereafter, the "Dee Complaint"; the Dee Complaint was endorsed by Reps. Leila De Lima and Percival Cendaña

⁸ Hereafter, the "Saballa Complaint"; the Saballa Complaint was endorsed also by Rep. Leila De Lima

⁹ Hereafter, the "Cabrera Complaint"; the Cabrera Complaint was endorsed by Rep. Bienvenido Abante, Jr. and Francisco Paolo P. Ortega

¹⁰ Committee hearings were conducted on March 2-4, 2026, March 25, 2026, April 14, 2026, April 22, 2026, and April 29, 2026

subsequently transmitted said Articles of Impeachment to the Senate on May 13, 2026.

The Articles of Impeachment allege the following grounds:

Article I

Respondent Vice President Sara Z. Duterte committed culpable violation of the Constitution, graft and corruption, and betrayed public trust through the systematic misuse, misappropriation, and irregular liquidation of confidential funds amounting to Php500,000,000.00 released to the Office of the Vice President and Php112,500,000.00 released to the Department of Education

Article II

Respondent Vice President Sara Z. Duterte committed culpable violation of the Constitution and betrayed public trust when she:

- A. Amassed unexplained wealth manifestly disproportionate to her lawful income and earnings during her incumbency as a public official;
- B. Failed to fully and truthfully disclose all her and her spouse's assets, liabilities, and net worth in her Statement of Assets, Liabilities, and Net Worth ("SALN"), including in her SALN for the years 2022, 2023, and 2024; and
- C. Failed to divest, and instead, willfully continued all her business interests during her tenure as Vice President for the years 2022, 2023, 2024, and 2025.

Article III

Respondent Vice President Sara Z. Duterte committed bribery, graft and corruption, culpable violation of the Constitution, and betrayed public trust when she gave monetary gifts or payments to DepEd officials to induce the violation and circumvention of procurement and other related laws

Article IV

Respondent Vice President Sara Z. Duterte committed culpable violation of the Constitution, high crimes, and betrayed public trust by contracting for the assassination of the President, the First Lady, and the former Speaker of the House, by making grave threats, and by actively inciting sedition against the Republic

Upon said grounds, the Prosecution then asks this Honorable Court to (a) declare the Vice President guilty on all the Articles;¹¹ (b) impose upon her the penalty of removal from office as Vice President of the Republic of the Philippines and perpetual disqualification from holding any office;¹² and (c) declare that she shall further be liable to prosecution, trial, and punishment.¹³

The Vice President categorically denies all the allegations against her. The Articles of Impeachment, the purported evidence allegedly supporting them, and the impeachment proceedings that produced them violate the Constitution, settled jurisprudence, and fundamental principles of law. They are the product of an impermissible fishing expedition and blatant usurpation of authority that the Constitution exclusively vests in the Senate acting as an Impeachment Court. Moreover, the charges in the Articles of Impeachment do not rise to the level of any impeachable offenses. They are not grounded in fact or law but consist of bare conclusions devoid of any substance, merit, and evidentiary foundation.

Admitted Facts

The Vice President has no further factual admissions other than those contained in the Answer dated May 25, 2026, Letter dated March 24, 2026, as well as the Petition dated March 30, 2026 filed with the Supreme Court.

Proposed Stipulation of Facts

1. On August 22, 2022, the Office of the Vice President¹⁴ wrote to then-Secretary of the Department of Budget and Management,¹⁵ Amenah Pangandaman,¹⁶ expressing its *“gratitude for the recommendation on the recalibrated budget level under the FY 2023 National Expenditure Program”*.

2. In that same Letter, the OVP likewise requested a total of P403.46 Million for various purposes *“to ensure continuous operations of the OVP under the current year”*.

3. In said August 22, 2022 Letter to the DBM, the OVP also requested confidential funds¹⁷ in the amount of P250 Million *“for and in consideration of the safe implementation of the various projects and activities under the Good Governance program and the conduct of official engagements and functional representation in international and domestic events as instructed by the President”*.

¹¹ Articles of Impeachment, p. 3

¹² *Id.*

¹³ *Id.*

¹⁴ Hereafter, “OVP”

¹⁵ Hereafter, “DBM”

¹⁶ Hereafter, “Pangandaman”

¹⁷ Hereafter, “CF”

4. On September 15, 2022, the DBM sent a Letter to the OVP addressed to Usec. Zuleika Lopez, Chief of Staff of the OVP, and signed by Maria Grace Delos Santos, Director IV, BMB-C, requesting the OVP for the submission of the following documents:

a. Interim/financial accountability report. Based on the submitted Statement of Appropriations, Allotments, Obligations, Disbursements and Balances (FAR No. 1) as of June 30, 2022, out of OVP's FY 2022 allotment of P343.970 Million for financial assistance/subsidy, P198.297 Million remains unobligated.

b. Assumptions and computations used in the proposed augmentation of the financial assistance/subsidy amounting to P144.720 Million; and

c. Physical and financial plan for the proposed Confidential Funds pursuant to Item 4.2 of the COA-DBM-DILG-GCG-DND Joint Circular No. 2015-01 dated January 8, 2015.

5. On September 19, 2022, the OVP wrote a Letter to the DBM addressed to Dir. Delos Santos in response to her Letter dated September 15, 2022, submitting the (a) Financial Accountability Report as of August 31, 2022; (b) Copy of the submitted computation in forecasting the requirement for medical assistance; and (c) Physical and Financial Plan, as prescribed under COA-DBM-DILG-GCG-DND Joint Circular No. 2015-01.¹⁸

6. On October 18, 2022, the then-Secretary of the DBM, Pangandaman, issued a Memorandum for the President thru the Executive Secretary, recommending the approval of the OVP request in the amount of P221.424 Million, chargeable against the Contingent Fund under the FY 2022 GAA, RA No. 11639, to cover the following Maintenance and Other Operating Expenses¹⁹ Items:

Particulars	Amount (‘000)
Financial Assistance/Subsidy	96,424
Confidential Fund	125,000
Total	221,424

7. In recommending the amount of P125 Million in CF for the OVP, the former DBM Secretary Pangandaman stated in paragraph 2.3.3 of her Memorandum for the President dated October 18, 2022 that *“the proposed CF covers the safe*

¹⁸ Hereafter, “JC No. 2015-01”

¹⁹ Hereafter, “MOOE”

implementation of OVP's programs and projects for the 2nd semester of FY 2022. However, considering that the first half of the semester is already over, we are only recommending ₱125 Million to cover the requirement for the last quarter of the year".

8. On November 28, 2022, the Office of the President²⁰ approved the recommendation of the DBM for the release of ₱221,424,000 to cover the following MOOE Items: (a) Financial Assistance/Subsidy – ₱96,424,000, and (b) Confidential Fund – ₱125,000,000, through a Memorandum from the Executive Secretary and signed by the former Executive Secretary Lucas Bersamin by order of the President.

9. On December 13, 2022, the DBM issued Special Allotment Release Order²¹ No. SARO-BMB-C-22-0012004 signed by then-Secretary Pangandaman, in the amount of ₱221,424,000 to cover the Financial Assistance/Subsidy and CF per approval of the Office of the President dated November 28, 2022.

10. Said SARO No. SARO-BMB-C-22-0012004 notes on its first page that "the allotment herein released shall be valid for obligation until December 31, 2023".

11. On December 20, 2022, the cash advance for the requested CF was released under Land Bank of the Philippines Check No. 244027 in the amount of ₱125,000,000.

12. On January 10, 2023, the OVP submitted to the Intelligence and Confidential Funds Office²² the Liquidation Report and its supporting documents for liquidation for the confidential expenses of the OVP for the period from December 21 to 31, 2022.

13. On January 13, 2023, the OVP submitted an Accomplishment Report to the Office of the President and the Speaker of the HOR.

14. On January 16, 2023, the OVP submitted an Accomplishment Report to the Senate President.

15. On January 17, 2023, the OVP submitted a liquidation report with the Commission on Audit.²³

16. On October 4, 2023, the OVP received the Audit Observation Memorandum²⁴ No. 2023-211 dated September 14, 2023, and AOM No. 2023-213 dated October 3, 2023.

²⁰ Hereafter, "OP"

²¹ Hereafter, "SARO"

²² Hereafter, "ICFAO"

²³ Hereafter, "COA"

²⁴ Hereafter, "AOM"

17. In response to the AOM Nos. 2023-211 dated September 14, 2023 and 2023-213 dated October 3, 2023, the OVP submitted a letter to the COA-ICFAO on October 19, 2023.

18. On November 30, 2023, the OVP submitted a supplemental letter to COA-ICFAO relative to AOM Nos. 2023-211 dated September 14, 2023 and 2023-213 dated October 3, 2023, *"to further explain the propriety, validity, and regularity of all transactions related to said cash advance"*.

19. On December 13, 2023, COA-ICFAO issued the Notice of Suspension²⁵ No. 2023-001 suspending the entire ₱125M in audit, which Notice was received by the respondent on December 14, 2023.

20. On March 13, 2024, the OVP submitted a Letter-Response to said NS.

21. On March 22, 2024, the OVP submitted a supplemental letter to the COA-ICFAO.

22. On August 9, 2024, the respondent and Gina Acosta received the Notice of Disallowance²⁶ No. 2024-002-100 (2022) dated August 8, 2024 disallowing the amount of ₱73,287,000 in confidential expenses of the OVP.

23. Miss Julieta Villadelrey, OVP Chief Accountant, received a copy of said ND on August 12, 2024.

24. On February 5, 2025, the respondent, Acosta, and Villadelrey, filed an appeal of said ND through a Petition for Review with the COA Commission Proper seeking to reverse and set aside the Notice of Disallowance No. 2024-002-100 (2022) dated August 8, 2024.

25. On April 22, 2026, the respondent, Acosta, and Villadelrey, received the COA Decision No. 2026-171 dated April 10, 2026.

26. On May 21, 2026, the respondent, Acosta, and Villadelrey filed a Motion for Reconsideration²⁷ of the COA Decision No. 2026-171 dated April 10, 2026.

27. Said MR is still pending to this day.

28. Prior to the respondent's receipt of the COA Decision No. 2026-171 on April 22, 2026, Atty. Gloria Camora appeared before the HOR Committee on Justice publicly disclosing said COA Decision.

²⁵ Hereafter, "NS"

²⁶ Hereafter, "ND"

²⁷ Hereafter, "MR"

29. The COA-ICFAO did not issue any NS or ND on the confidential expenses of the Department of Education²⁸ for 2023, during the term of respondent as its Department Secretary.

30. The COA-ICFAO issued Credit Notice No. 2024-162 dated August 8, 2024 for the DepEd confidential expenses covering the period February 20 to March 30, 2023 and April 20 to June 29, 2023, in the total amount of ₱75 Million.

31. The HOR-Committee on Justice did not provide the respondent with copies of the following documents prior to its committee hearing on April 14, 2026:²⁹

ANNEX	DESCRIPTION
A	Transcript of Stenographic Notes (“TSN”) of the House of Representatives’ Committee on Good Government and Public Accountability (“CGGPA”) hearing on November 25, 2024
B	OVP <i>Certification</i> dated January 10, 2022
C	OVP <i>Certification</i> dated March 30, 2023
D	OVP <i>Certification</i> dated July 11, 2023
E	OVP <i>Certification</i> dated October 9, 2023
F	DepEd <i>Certification</i> dated March 31, 2023
G	DepEd <i>Certification</i> dated June 30, 2023
H	DepEd <i>Certification</i> dated October 2, 2023
I	COA’s <i>Notice of Disallowance</i> dated March 31, 2026
J	COA’s <i>Decision</i> dated April 10, 2026
K	TSN of CGGPA hearing on September 18, 2024
L	TSN of CGGPA hearing on September 25, 2024
M	TSN of CGGPA hearing on October 17, 2024,
N	TSN of CGGPA hearing on November 5, 2024,
O	TSN of CGGPA hearing on November 20, 2024
P	TSN of CGGPA hearing on December 9, 2024
Q	TSN of CGGPA hearing November 11, 2024
R	A copy each of the Land Bank of the Philippines (“LBP”) Check No. 0000244027 dated December 20, 2022
S	Disbursement Voucher (“DV”) No. 2022-12-07222 dated December 20, 2022
T	LBP Check No. 000244053 dated January 31, 2023
U	DV No. 2023-01-00222 dated January 31, 2023
V	LBP Check No. 000245511 dated April 18, 2023
W	DV No. 2023-04-01791 dated April 10, 2023
X	LBP Check No. 0000245664 dated July 13, 2023
Y	DV No. 2023-07-04361 dated July 13, 2023

²⁸ Hereafter: “DepEd”

²⁹ The descriptions of documents in the succeeding table are not from the respondent but are verbatim copies of the descriptions indicated in the House Committee on Justice’s document entitled “List of Annexes” transmitted through electronic mail on May 6, 2026 at 3:17 P.M. to the respondent

Z	OVP Liquidation Report No. 2022-12-152 dated January 10, 2023
A ²	OVP Updated Accomplishment Report for the period December 21 to 31, 2022
B ²	OVP Undated Accomplishment Report for the period December 21 to 31, 2022
C ²	Proof of submission dated January 10, 2023 to the Office of the President and received on January 13, 2023
D ²	Proof of Submission to Senate dated January 10, 2023
E ²	Proof of Submission dated January 10, 2023 to the Speaker of the House of Representatives and received on January 13, 2023
F ²	Liquidation Report No. 2023-03-31 dated March 29, 2023
G ²	Proof of submission dated April 3, 2023 to the Office of the President
H ²	Proof of submission dated April 3, 2023 to the Senate President
I ²	Proof of submission dated April 3, 2023 to the Speaker of the House
J ²	OVP Accomplishment Report dated March 30, 2023 for the period February 6 to March 29, 2023
K ²	Liquidation Report No. 2023-07-133 dated July 11, 2023
L ²	Proof of submission dated July 12, 2023 to the Office of the President and received on July 12, 2023
M ²	Proof of Submission dated July 12, 2023 to the Senate President and received on July 12, 2023
N ²	Proof of Submission dated July 12, 2023 to the Speaker and received on July 12, 2023
O ²	OVP Accomplishment Report dated July 11, 2023 for the period April 25 to June 30, 2023
P ²	Liquidation Report No. 2023-10-216 dated October 23, 2023
Q ²	Proof of submission dated October 10, 2023 to the Office of the President and received on October 11, 2023
R ²	Proof of submission dated October 10, 2023 to the Senate President and received on October 11, 2023
S ²	Proof of Submission dated October 10, 2023 to the Speaker and received on October 12, 2023
T ²	OVP Accomplishment Report dated October 9, 2023 for the period July 14 to September 30, 2023
U ²	Documentary Evidence of Payments ("DEPS") with payee name "Milky Secuya"
V ²	Documentary Evidence of Payments ("DEPS") with payee name "Kokoy Villamin"
W ²	Documentary Evidence of Payments with payee "Mary Grace Piattos"
X ²	DEPs where the names of the payee are either unreadable,

	have incomplete names, are unsigned, have no names at all, or are undated (attached as Annex N to the Saballa, et al Impeachment Complaint)
Y ²	DEPs showing the physical impossibility of actual disbursement (attached as Annex "O" to the Saballa, et al. Impeachment Complaint)
Z ²	DEPs bearing dates within periods within which OVP had no Confidential Funds to be disbursed (attached as Annex "P" to the 3rd Impeachment Complaint)
A ³	LBP Check No. 0000000453 dated February 20, 2023
B ³	DV No. 23-02-2987
C ³	LBP Check No. 0000000964 dated April 19, 2023
D ³	Unnumbered and undated DV for 2nd Qtr. of CY 2023
E ³	LBP Check No. 0000002250 dated July 11, 2023
F ³	DV No. 23-07-10503 dated July 11, 2023
G ³	Liquidation Report No. 2023-03-30 dated March 31, 2023
H ³	Proof of submission dated April 3, 2023 to the Office of the President and received on April 11, 2023
I ³	Proof of Submission dated April 3, 2023 to the Senate President and received on April 11, 2023
J ³	Proof of submission dated April 31, 2023 to the Speaker of the House of Representatives and received on April 11, 2023
K ³	DepEd Accomplishment Report dated March 31, 2023 for the period February 20 to March 30, 2023
L ³	Liquidation Report No. 2023-06-30 dated June 30, 2023
M ³	Proof of submission dated July 5, 2023 to the Office of the President and received on July 5, 2023
N ³	Proof of Submission to Senate dated July 5, 2023
O ³	Proof of Submission to Speaker dated July 5, 2023
P ³	DepEd Accomplishment Report dated June 30, 2023 for the period April 20 to June 29, 2023
Q ³	Liquidation Report No. 2023-09-30 dated September 29, 2023
R ³	Proof of Submission dated October 9, 2023 to the Office of the President and received on October 11, 2023
S ³	Proof of Submission to Senate dated October 9, 2023
T ³	Proof of Submission to Speaker dated October 9, 2023
U ³	DepEd Accomplishment Report dated September 30, 2023 for the period July 12 to September 30, 2023
V ³	Certification dated January 1, 2024 issued by Col. Manaros M. Boransing II of the 1st Infantry (Tabak) Division, Philippine Army (PA) for the success of the surveillance activities
W ³	Certification dated December 30, 2023 issued by Lieutenant Colonel Carlos B. Sangdaan Jr. of the 5th Infantry (Star) Division, PA for the success of the surveillance activities

X ³	Certification dated December 5, 2023 issued by Lieutenant Colonel Magtangol G. Panopio of the 7th Infantry (Kaugnay) Division, PA for the success of the surveillance activities
Y ³	Undated letter to the Department of Education by the 9th Infantry (Spear) Division, PA, DepEd Order No. 001, s. 2023 dated January 9, 2023 on the Revised Designation of Undersecretaries and Assistant Secretaries to their Strands and Functional Areas of Responsibilities and Revised Signing Authorities
Z ³	DV No. 23-04-5905 dated April 19, 2023
A ⁴	Credit Notice No. 2024-162 dated August 8, 2024
B ⁴	DEPs with signatures only (attached as Annex "W" to the 3 rd Impeachment Complaint)
C ⁴	DEPs showing physical impossibility of actual disbursement (attached as Annex "X" to the 3 rd Impeachment Complaint)
E ⁴	DEPs, different individuals, same signature (attached as Annex "Z" to the 3 rd Impeachment Complaint)
F ⁴	DEPs with payee name "Alice Crecensio"
G ⁴	Notice of Disallowance No. 2024-002-100 (2022) dated August 8, 2024
H ⁴	COA Letter in compliance with Subpoena Duces Tecum, dated August 21, 2024 (attached as Annex "K" to the 3 rd Impeachment Complaint)
I ⁴	OVP Letter to Chairman Cordoba, August 21, 2024
J ⁴	Audit Observation Memorandum ("AOM") No. 2024-014 dated February 1, 2024
K ⁴	AOM No. 2024-015 dated February 1, 2024
L ⁴	Compliance letter dated April 19, 2024 in reference to AOM No. 2024-014 dated February 1, 2024
M ⁴	Compliance letter dated April 17, 2024 in reference to AOM No. 2024-015 dated February 1, 2024
N ⁴	Certification dated April 4, 2024 issued by Col. Raymund Dante P. Lachica with regard to the confidential activities performed by the OVP
O ⁴	DepEd Reply dated April 17, 2024
P ⁴	AOM No. 2024-170 dated August 8, 2024
Q ⁴	AOM No. 2024-171 dated August 8, 2024
R ⁴	NBI Questioned Documents Report No. 130-425 dated May 28, 2025
S ⁴	Questioned Documents Report No. 302-724 dated May 28, 2025
V ⁴	Ramil Madriaga's Affidavit dated November 29, 2025
W ⁴	Ramil Madriaga's Supplemental Affidavit dated April 11, 2026
X ⁴	The Certification of Appearance dated April 7, 2026
Y ⁴	IBP ID of Atty. Cynthia P. Viñas-Pantoñal
Z ⁴	IBP ID of Atty. Raymund P. Palad

A ⁵	Logbook containing Entry No. 001344 on November 29, 2025
B ⁵	Photos of lawyer's visit to PDL Ramil Madriaga
C ⁵	Court Certification dated March 26, 2026
D ⁵	Identification Cards of Ramil Madriaga (Driver's License and Philhealth ID)
E ⁵	Oath of Office of Atty. Cynthia P. Viñas-Pantoñal dated December 11, 2023
F ⁵	Certification by the Hon. Byron G. San Pedro, Executive Judge of the Regional Trial Court – Taguig City dated December 11, 2023

32. The following documents were not attached either to the Saballa or Cabrera Complaints:³⁰

ANNEX	DESCRIPTION
A	Transcript of Stenographic Notes ("TSN") of the House of Representatives' Committee on Good Government and Public Accountability ("CGGPA") hearing on November 25, 2024
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L	TSN of CGGPA hearing on September 25, 2024
M	TSN of CGGPA hearing on October 17, 2024,
N	TSN of CGGPA hearing on November 5, 2024,
O	TSN of CGGPA hearing on November 20, 2024
P	TSN of CGGPA hearing on December 9, 2024
Q	TSN of CGGPA hearing November 11, 2024
R	A copy each of the Land Bank of the Philippines ("LBP") Check No. 0000244027 dated December 20, 2022
S	Disbursement Voucher ("DV") No. 2022-12-07222 dated December 20, 2022
T	LBP Check No. 000244053 dated January 31, 2023
U	DV No. 2023-01-00222 dated January 31, 2023
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X	LBP Check No. 0000245664 dated July 13, 2023
Y	DV No. 2023-07-04361 dated July 13, 2023
C ²	Proof of submission dated January 10, 2023 to the Office of the President and received on January 13, 2023
D ²	Proof of Submission to Senate dated January 10, 2023
E ²	Proof of Submission dated January 10, 2023 to the Speaker of the House of Representatives and received on January 13, 2023

³⁰ The descriptions of documents in the succeeding table are not from the defense but are verbatim copies of the descriptions indicated in the House Committee on Justice's document entitled "List of Annexes" transmitted through electronic mail on May 6, 2026 at 3:17 P.M. to the respondent

F ²	Liquidation Report No. 2023-03-31 dated March 29, 2023
G ²	Proof of submission dated April 3, 2023 to the Office of the President
H ²	Proof of submission dated April 3, 2023 to the Senate President
I ²	Proof of submission dated April 3, 2023 to the Speaker of the House
K ²	Liquidation Report No. 2023-07-133 dated July 11, 2023
L ²	Proof of submission dated July 12, 2023 to the Office of the President and received on July 12, 2023
M ²	Proof of Submission dated July 12, 2023 to the Senate President and received on July 12, 2023
N ²	Proof of Submission dated July 12, 2023 to the Speaker and received on July 12, 2023
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N ³	Proof of Submission to Senate dated July 5, 2023
O ³	Proof of Submission to Speaker dated July 5, 2023
Q ³	Liquidation Report No. 2023-09-30 dated September 29, 2023
R ³	Proof of Submission dated October 9, 2023 to the Office of the President and received on October 11, 2023
S ³	Proof of Submission to Senate dated October 9, 2023
T ³	Proof of Submission to Speaker dated October 9, 2023
Z ³	DV No. 23-04-5905 dated April 19, 2023

A ⁴	Credit Notice No. 2024-162 dated August 8, 2024
F ⁴	DEPs with payee name "Alice Crecensio"
J ⁴	Audit Observation Memorandum ("AOM") No. 2024-014 dated February 1, 2024
L ⁴	Compliance letter dated April 19, 2024 in reference to AOM No. 2024-014 dated February 1, 2024
N ⁴	Certification dated April 4, 2024 issued by Col. Raymund Dante P. Lachica with regard to the confidential activities performed by the OVP
P ⁴	AOM No. 2024-170 dated August 8, 2024
Q ⁴	AOM No. 2024-171 dated August 8, 2024
R ⁴	NBI Questioned Documents Report No. 130-425 dated May 28, 2025
S ⁴	Questioned Documents Report No. 302-724 dated May 28, 2025
W ⁴	Ramil Madriaga's Supplemental Affidavit dated April 11, 2026
X ⁴	The Certification of Appearance dated April 7, 2026
Y ⁴	IBP ID of Atty. Cynthia P. Viñas-Pantoñal
Z ⁴	IBP ID of Atty. Raymund P. Palad
A ⁵	Logbook containing Entry No. 001344 on November 29, 2025
B ⁵	Photos of lawyer's visit to PDL Ramil Madriaga
C ⁵	Court Certification dated March 26, 2026
D ⁵	Identification Cards of Ramil Madriaga (Driver's License and Philhealth ID)
E ⁵	Oath of Office of Atty. Cynthia P. Viñas-Pantoñal dated December 11, 2023
F ⁵	Certification by the Hon. Byron G. San Pedro, Executive Judge of the Regional Trial Court – Taguig City dated December 11, 2023

33. The respondent filed her Statements of Assets, Liabilities, and Net Worth³¹ for the year 2022.

34. The respondent filed her SALN for the year 2023.

35. The respondent filed her SALN for the year 2024.

36. The respondent filed her SALN for the year 2025.

37. The respondent was not in public office in 2013, 2014, and 2015.

38. The respondent was not holding any impeachable office from 2007 to 2009 since she was the then-Vice Mayor of Davao City.

³¹ Hereafter, "SALN"

39. The respondent was not holding any impeachable office from 2010 to 2012 and from 2016 to 2021 since she was the then-Mayor of Davao City.

40. As of the date of the filing of the Impeachment Complaints against the respondent, no case was filed nor investigations conducted against the respondent in relation to any of her SALNs.

41. The HOR-Committee on Justice did not provide the respondent with copies of the following documents prior to its committee hearing on April 22, 2026:³²

ANNEX	DESCRIPTION
K ⁸	SALN for 2007
L ⁸	SALN for 2008
M ⁸	SALN for 2009
N ⁸	SALN for 2010
O ⁸	SALN for 2011
P ⁸	SALN for 2012
Q ⁸	SALN for 2016
R ⁸	SALN for 2017
S ⁸	SALN for 2018
T ⁸	SALN for 2019
U ⁸	SALN for 2020
V ⁸	SALN for 2021
W ⁸	SALN for 2022
X ⁸	SALN for 2023
Y ⁸	SALN for 2024
Z ⁸	AMLC LETTER dated 4/22/26
A ⁹	CTRs for 2006 to 2025 Sara
A ⁹ -1	CTR Mans
B ⁹	STRs for 2006 to 2025 - Sara
C ⁹	Financial Intelligence Reports on Vice President Sara-Duterte Carpio
D ⁹	INVESTIGATION REPORTS
E ⁹	Former Senator Antonio Trillanes IV's <i>Sinumpaang Salaysay</i> dated April 21, 2026 and its annexes
F ⁹	USB with all videos

42. The following documents were not attached either to the Saballa or Cabrera Complaints:³³

³² The descriptions of documents in the succeeding table are not from the defense but are verbatim copies of the descriptions indicated in the House Committee on Justice's document entitled "List of Annexes" transmitted through electronic mail on May 6, 2026 at 3:17 P.M. to the respondent

³³ The descriptions of documents in the succeeding table are not from the defense but are verbatim copies of the descriptions indicated in the House Committee on Justice's document entitled "List of Annexes" transmitted through electronic mail on May 6, 2026 at 3:17 P.M. to the respondent

ANNEX	DESCRIPTION
G ⁵	A copy each of Metro City Chow Foods Corp.'s Articles of Incorporation
H ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2018
I ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2019
J ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2020
K ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2021
L ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2022
M ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2022 - Amended
N ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2023
O ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2024
P ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2025
Q ⁵	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2025 - Amended
R ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2008
S ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2009
T ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2010
U ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2011
V ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2012
W ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2013
X ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2014
Y ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2015
Z ⁵	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2016
A ⁶	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2017

B ⁶	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2018
C ⁶	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2019 (May)
D ⁶	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2019 (June)
E ⁶	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2020
F ⁶	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2021
G ⁶	Gencorp Industries, Inc.'s General Information Sheet for the Year 2021
H ⁶	Gencorp Industries, Inc.'s General Information Sheet for the Year 2022
I ⁶	Gencorp Industries, Inc.'s General Information Sheet for the Year 2022 Amended
J ⁶	Gencorp Industries, Inc.'s General Information Sheet for the Year 2023
K ⁶	Gencorp Industries, Inc.'s General Information Sheet for the Year 2024
L ⁶	Gencorp Industries, Inc.'s General Information Sheet for the Year 2025
M ⁶	Carpio Lawyers' Articles of Partnership
N ⁶	CALE88 FOODS Corp.'s General Information Sheets for the Year 2022
O ⁶	CALE88 FOODS Corp.'s General Information Sheets for the Year 2022 (Amended) (Received September 2022)
P ⁶	CALE88 FOODS Corp.'s General Information Sheets for the Year 2022 (Amended) (Received February 2023),
Q ⁶	CALE88 FOODS Corp.'s General Information Sheets for the Year 2023
R ⁶	CALE88 FOODS Corp.'s General Information Sheets for the Year 2024
S ⁶	CALE88 FOODS Corp.'s General Information Sheets for the Year 2025
T ⁶	Certification of Non-Registration of Company for Madayaw Fisheries Corp.
U ⁶	Articles of Incorporation for Madayaw Fisheries Inc.
V ⁶	Mati City Ice Plant and Cold Storage Inc.'s GIS 2024
W ⁶	Mati City Ice Plant and Cold Storage Inc.'s GIS 2025
X ⁶	Mati City Ice Plant and Cold Storage Inc.'s GIS 2026
Y ⁶	Amianan Shores Inc AOI
Z ⁶	Geometry Security Agency GIS 2023
A ⁷	Geometry Security Agency GIS 2024

B ⁷	Geometry Security Agency GIS 2025
C ⁷	Cabletow 88 Shipping and Marine Services, Inc.'s Articles of Incorporation
D ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2017
E ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2018
F ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2019
G ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2020
H ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2021
I ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2022
J ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2023
K ⁷	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2024
L ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2007
M ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2008
N ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2009
O ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2010
P ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2011
Q ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2012
R ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2013
S ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2014
T ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2015
U ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2016
V ⁷	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2017
W ⁷	City Hall King Chow Foods Corp. Audited Financial Statements for the Year 2018
X ⁷	City Hall King Chow Foods Corp. Audited Financial

	Statements for the Year 2019
Y ⁷	City Hall King Chow Foods Corp. Audited Financial Statements for the Year 2020
Z ⁷	Gencorp Industries, Inc.'s Audited Financial Statements for the years 2021
A ⁸	Gencorp Industries, Inc.'s Audited Financial Statements for the years 2022
B ⁸	Gencorp Industries, Inc.'s Audited Financial Statements for the years 2023
C ⁸	Gencorp Industries, Inc.'s Audited Financial Statements for the years 2024
D ⁸	CALE88 FOODS Corp.'s AFS for the year 2021
E ⁸	CALE88 FOODS Corp.'s AFS for the year 2022
F ⁸	CALE88 FOODS Corp.'s AFS for the year 2023
G ⁸	Mati City Ice Plant and Cold Storage, Inc.'s ITR for the year 2023
H ⁸	Mati City Ice Plant and Cold Storage, In.'s ITR 2024
I ⁸	Geometry Security and Investigation Agency, Inc.'s AFS for the year 2024
J ⁸	Geometry Security and Investigation Agency, Inc.'s AFS for the year 2025
K ⁸	SALN for 2007
L ⁸	SALN for 2008
M ⁸	SALN for 2009
N ⁸	SALN for 2010
O ⁸	SALN for 2011
P ⁸	SALN for 2012
Q ⁸	SALN for 2016
R ⁸	SALN for 2017
S ⁸	SALN for 2018
T ⁸	SALN for 2019
U ⁸	SALN for 2020
V ⁸	SALN for 2021
W ⁸	SALN for 2022
X ⁸	SALN for 2023
Y ⁸	SALN for 2024
Z ⁸	AMLC LETTER dated 4/22/26
A ⁹	CTRs for 2006 to 2025 Sara
A ⁹ -1	CTR Mans
B ⁹	STRs for 2006 to 2025 - Sara
C ⁹	Financial Intelligence Reports on Vice President Sara-Duterte Carpio
D ⁹	INVESTIGATION REPORTS
E ⁹	Former Senator Antonio Trillanes IV's <i>Sinumpaang Salaysay</i>

43. Former Usec. Gloria Jumamil-Mercado,³⁴ Human Resource and Organizational Development Head of Procuring Entity of the Department of Education requested the respondent who was the-then Secretary of Education for endorsement of her Application for Retirement to the Office of the President through Memorandum OM-OUHROD-2023-1554 dated October 16, 2023.

44. On the same day, October 16, 2023, Mercado also wrote a Letter to President Ferdinand Marcos, Jr. requesting the latter's approval of her application for retirement effective November 1, 2023.

45. The following day, or on October 17, 2023, the respondent wrote a Memorandum for Pres. Marcos, Jr. through the then-Executive Secretary Bersamin regarding said application for retirement of Mercado.

46. Atty. Reynold Munsayac was appointed as Assistant Secretary for Procurement of the DepEd on October 1, 2023.

47. On November 20, 2024, upon motion of then-Representative France L. Castro, the Committee on Good Government and Public Accountability (CGGPA, also known as the QuadComm) of the HOR – 19th Congress cited in contempt Usec. Atty. Zuleika Lopez,³⁵ Chief of Staff of the Office of the Vice President.

48. During the November 20, 2024 hearing, Rep. Joel Chua instructed the Sergeant-at-Arms to assign a room within the HOR premises where Atty. Lopez was to be detained for five (5) days.

49. On November 21, 2024, Atty. Lopez filed a Motion for Reconsideration dated November 20, 2024, of the HOR Order citing her in contempt.

50. On November 22, 2024, Rep. Joel Chua issued an Order directing the transfer of Atty. Lopez from the HOR to the Women's Correctional Facility in Mandaluyong City.

51. Shortly after, House Legislative Security Bureau Executive Director Belinda Bello, together with police officers, attempted to enter the HOR Detention Facility where Atty. Lopez was being held to implement the aforesaid transfer Order dated November 22, 2024.

52. On January 30, 2025, the former National Bureau of Investigation³⁶ Director Judge Jaime Santiago wrote a letter addressed to Prosecutor General

³⁴ Hereafter, "Mercado"

³⁵ Hereafter, "Atty. Lopez"

³⁶ Hereafter, "NBI"

Richard Anthony Fadullon of the National Prosecution Service,³⁷ Department of Justice,³⁸ transmitting its recommendation for the prosecution of the Respondent of one (1) count of Inciting to Sedition and three (3) counts of Grave Threats.

53. On February 5, 2025, Senior Assistant State Prosecutor Jayvee Laurence Bandong³⁹ of the DOJ issued a Certification stating that the Complaint/referral from the NBI does not contain evidence to prove the essential elements of the crime, thus “insufficient for the conduct of preliminary investigation and must first be referred for case build-up”.

54. On February 11, 2025, the former NBI Director Santiago sent a Letter addressed to Prosecutor General Richard Anthony Fadullon of the NPS-DOJ, confirming that on February 10, 2025, the NBI received the Certification dated February 5, 2025 of SASP Bandong and submitting a revised Affidavit of Investigation.

55. On April 25, 2025, the DOJ Panel of Prosecutors issued a Subpoena to the respondent requiring her to appear before the panel of prosecutors and to submit her counter-affidavit on May 9 and 16, 2025 in the preliminary investigation of the complaint for Inciting to Sedition and Grave Threats titled “National Bureau of Investigation-Cybercrime Division (NBI-CCD) v. Sara Z. Duterte” and docketed as NPS Docket No. XVI-INV-25C-00048.

56. The Complaint for Grave Threats and Inciting to Sedition against the respondent remains pending as of today.

57. The HOR-Committee on Justice did not provide the respondent with copies of the following documents prior to the committee hearing on April 29, 2026:⁴⁰

ANNEX	DESCRIPTION
F ⁹	USB with all videos
G ⁹	Affidavit of Investigation

58. The documents referred to in the table above were not attached to either the Saballa or Cabrera Complaints.

Statement of Issues

The respondent submits the following issues:

³⁷ Hereafter, “NPS”
³⁸ Hereafter, “DOJ”
³⁹ Hereafter, “SASP Bandong”
⁴⁰ The descriptions of documents in the succeeding table are not from the defense but are verbatim copies of the descriptions indicated in the House Committee on Justice’s document entitled “List of Annexes” transmitted through electronic mail on May 6, 2026 at 3:17 P.M. to the respondent

1. Whether the evidence procured by the House Committee on Justice during its “mini-trial” that had not been appended to any of the Saballa or Cabrera Complaints, should be excluded and expunged from the records;
2. Whether the allegations in the Articles of Impeachment constitute any impeachable offenses under the Constitution;
3. Whether the allegations in the Articles of Impeachment as well as the materials in support of it referring to periods when respondent was neither in public office nor holding any impeachable office, are irrelevant and therefore, should be stricken from the records;
4. Whether the Articles of Impeachment violate the constitutional rights of the respondent;
5. Whether there exists competent and credible evidence sufficient to hold the respondent liable for any of the charges in the Articles of Impeachment, in accordance with the required degree of proof under the Rules and case law.

Availment of Modes of Discovery

The respondent reserves the right to utilize modes of discovery.

Testimonial Evidence

The respondent intends to present the following witnesses:

- i. **Ramil Madriaga** – to disprove the allegations in the Articles of Impeachment, identify documents, and prove such other relevant matters related to the foregoing;
- ii. **The Notaries Public who notarized the Affidavit dated November 29, 2025 and Supplemental Affidavit dated April 11, 2026 of Ramil Madriaga** – who both shall testify on their supposed notarial acts, to identify documents, and other matters related to the foregoing;
- iii. **Ms. Marivic Pareja and/or a representative, official, and/or employee, whether former or current, of the Legislative Archives and Museum Management Service, HOR** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

iv. **Atty. Melvin Matibag and/or a representative, official, and/or employee, whether former or current of the NBI** – to disprove the allegations in the Articles of Impeachment, establish that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and prove such other matters related to the foregoing;

v. **Judge Jaime B. Santiago (Ret.) and/or a representative, official, and/or employee, whether former or current of the NBI** – to disprove the allegations in the Articles of Impeachment, establish that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and prove such other matters related to the foregoing;

vi. **Asst. Director Glenn Ricarte and/or a representative, official, and/or employee, whether former or current of the NBI** – to disprove the allegations in the Articles of Impeachment, establish that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and prove such other matters related to the foregoing;

vii. **Ms. Carolyn Moldez-Pitoy and/or a representative, official, and/or employee, whether former or current, of the NBI's Questioned Documents Division** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

viii. **Mr. Antonio Magbojos and/or a representative, official, and/or employee, whether former or current, of the NBI's Questioned Documents Division** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

ix. **Ms. Marizza Grande and/or a representative, official, and/or employee, whether former or current, of the Philippine Statistics Authority** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

x. **Atty. Gloria Camora and/or a representative, official, and/or employee, whether former or current, of the Commission on Audit's Intelligence and Confidential Funds Audit Office** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xi. **Lucas P. Bersamin and/or a representative, official and/or employee, whether former or current, of the Office of the Executive Secretary** –

to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xii. **Amenah F. Pangandaman and/or a representative, official, and/or employee, whether former or current, of the Department Budget and Management** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xiii. **Ombudsman Jesus Crispin Remulla and/or a representative, official, and/or employee, whether former or current, from the Office of the Ombudsman** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xiv. **Executive Director Ronel Buenaventura and/or at least two (2) representatives, officials, and/or employees, whether former or current, of the Anti-Money Laundering Council** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and prove such other matters related to the foregoing;

xv. **Antonio F. Trillanes IV** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xvi. **The Notary Public who notarized the *Sinumpaang Salaysay* dated April 21, 2026 of Antonio Trillanes IV** – who will testify on the supposed notarial act, to identify documents, and other matters related to the foregoing.

xvii. **Director Gerardo Del Rosario and/or a representative, official, and/or employee, whether former or current, from the Securities and Exchange Commission** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xviii. **Commissioner Charlito Martin Mendoza and/or a representative, official, and/or employee, whether former or current, from the BIR** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xix. **Gloria Jumamil-Mercado** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xx. **Agent John Mark Calilung of the NBI** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xxi. **SA Jeremy Lotoc of the NBI** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xxii. **SRA Homer Angluben of the NBI** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xxiii. **Atty. Al Matthew Umali of the NBI** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xxiv. **Atty. Ria Vanessa Asuncion of the NBI** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xxv. **Atty. Yentl Malicad of the NBI** – to disprove the allegations in the Articles of Impeachment, prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, identify documents, and establish such other matters related to the foregoing;

xxvi. **At least two (2) representatives, officials, and/or employees, whether former or current, of the Office of the Ombudsman – Mindanao** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxvii. **At least six (6) representatives, officials, and/or employees, whether former or current, permanent or temporary, of the City Government of Davao City** – to disprove the allegations in the Articles of Impeachment, prove the

material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxviii. **At least two (2) representatives, officials, and/or employees, whether former or current, of the Office of the President** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxix. **At least five (5) representatives, officials, and/or employees, whether former or current, from the COA** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxx. **At least seven (7) representatives, officials, or employees, whether former or current, from the DepEd** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxi. **At least seven (7) representatives, officials, or employees, whether former or current, from the OVP** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxii. **At least five (5) representatives, officials, or employees, whether former or current, from the Vice-Presidential Security and Protection Group** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxiii. **At least two (2) representatives, officials, and/or employees, whether former or current, from the DOJ** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxiv. **At least two (2) representatives, officials, and/or employees, whether former or current, from the NBI** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxv. **At least two (2) representatives, officials, and/or employees, whether former or current, from the Land Transportation Office** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxvi. **At least two (2) representatives, officials, and/or employees, whether former or current, from the Bureau of Jail Management and Penology** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxvii. **At least five (5) representatives, officials, and/or employees, whether former or current, of other National Government Agencies** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxviii. **At least five (5) representatives, directors, officers, owners, and/or employees, whether former or current, from the corporations, entities, or businesses listed in respondent's SALNs** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xxxix. **At least two (3) representatives, officials, employees, whether former or current, of the Civil Service Commission** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xl. **At least five (5) representatives and/or employees and/or investigative journalists, whether current or former, of media outlets, and/or social media news outlets** – to disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xli. **At least five (5) expert witnesses** – to disprove the allegations in the Articles of Impeachment as false, erroneous, and misleading; render their expert opinion; prove the material allegations in the Answer dated May 26, 2026; identify documents, and establish such other matters related to the foregoing;

xlii. **At least three (3) forensic accountants** – to disprove the allegations in the Articles of Impeachment as false, erroneous, and misleading; render their expert opinion; prove the material allegations in the Answer dated May 26, 2026; identify documents, and establish such other matters related to the foregoing;

xliii. **Notaries public** of any and all documentary evidence, including but not limited to affidavits, documents, and/or contracts, that will be presented either by the defense or the prosecution during the course of trial – to testify on the execution of the subject documentary evidence, disprove the allegations in the Articles of

Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and establish such other matters related to the foregoing;

xliv. **Signatories and/or witnesses** of any and all documentary evidence, including but not limited to, affidavits, documents, and/or contracts, that will be presented by either the defense or the prosecution during the course of trial – to testify on the execution of the subject documentary evidence, disprove the allegations in the Articles of Impeachment, prove the material allegations in the Answer dated May 26, 2026, identify documents, and prove such other matters related to the foregoing; and

xlv. **Witnesses who will controvert, refute, and/or disprove any and all** testimonial, object, and/or documentary evidence that will be presented by the prosecution during the course of trial.

Since the burden of proof never shifts, it is incumbent upon the Prosecution to prove their allegations in the Articles of Impeachment. Until the Prosecution is able to present any such credible, competent, and admissible evidence, the respondent reserves the right to present additional controverting evidence.

In addition, pursuant to the Notice of Pre-Trial Conference dated June 9, 2026,⁴¹ which expressly permits the parties to make reservations on the names and details of their witnesses,⁴² the respondent reserves the right to disclose the identities and other details of her witnesses for security and safety reasons, at the appropriate time. This reservation is being made to protect the respondent's other witnesses from unlawful surveillance, undue intimidation, harassment, coercion, threats of any form, including criminal prosecution, detention or oppressive suits, or any attempts to malign them before the general public, prior to their presentation.

Finally, the respondent reserves the right to present the foregoing witnesses and reserved witnesses for purposes other than those stated above and in accordance with the disclosure guidelines in the Notice of Pre-Trial Conference dated June 9, 2026.⁴³

Documentary Evidence

59. The respondent intends to present the following documentary evidence during the course of trial:

Exhibit	Document	Purpose
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⁴¹ See Notice of Pre-Trial Conference dated June 9, 2026, p. 2

⁴² *Id.*

⁴³ See Notice of Pre-Trial Conference dated June 9, 2026, p. 2

1-1-OVP	Certified True Copy ⁴⁴ of the Letter dated January 17, 2023 addressed to the Chairperson of the Commission on Audit	To: 1. Disprove the allegations in the Articles of Impeachment; 2. Prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, misleading, and erroneous. 3. Establish that the respondent did not misuse, misappropriate, or irregularly liquidate confidential funds released to the Office of the Vice President. 4. Prove the material allegations in the Answer dated May 26, 2026 5. Other matters related to the foregoing.
1-2-OVP	CTC of the Memorandum dated January 10, 2023 for Lemuel G. Ortonio	
1-3-OVP	CTC of the Liquidation Report No. 2022-12-152 dated January 10, 2023	
1-4-OVP	CTC of Landbank of the Philippines Check No. 0000244027 dated December 20, 2022 for the account of the Office of the Vice President	
1-5-OVP	CTC of Disbursement Voucher No. 2022-12-07222 dated December 20, 2022	
1-6-OVP	CTC of the Certification dated January 10, 2022 signed by Gina F. Acosta as the Special Disbursing Officer	
1-7-OVP	CTC of the Letter dated December 28, 2022 addressed to Marvin Joshua J. Palitic, Audit Team Leader, Office of the Vice President	
1-8-OVP	CTC of Special Order No. 2022-147 dated December 15, 2022	
1-9-OVP	CTC of the Confirmation Letter dated November 3, 2022 by Rosalia V. De Leon, Treasurer of the Philippines through Lourdes Santos Tating	
1-10-OVP	CTC of the Authority to Accept Payment No. 1301-2022-01512	
1-11-OVP	CTC of the Certification dated December 20, 2022 signed by Julieta L. Villadelrey	
1-12-OVP	CTC of the Specimen Signatures of Accountable Officers and the Officials Authorized to Sign the Liquidation Report (LR), Disbursement Voucher (DV), and Obligation Requests (OBR)	
1-13-OVP	CTC of the Memorandum from the Executive Secretary dated November 20, 2022 signed by Lucas P. Bersamin	
1-14-OVP	CTC of the Letter dated August 22, 2022 addressed to Hon. Amenah F. Pangandaman, Secretary, Department of Budget and Management	

⁴⁴ Hereafter, "CTC"

1-15-OVP	CTC of the Letter dated September 19, 2022 signed by Lemuel G. Ortonio	Same as above.
1-16-OVP	CTC of the Statement of Appropriations, Allotments, Obligations, Disbursements, and Balances as of August 31, 2022	
1-17-OVP	CTC of the OVP Public Assistance Division – Budget Projection for September to December 2022 (Data based on Processed Applications as of August 19, 2022) ⁴⁵	
1-18-OVP	CTC of the VPSPG SDA Requirement (July-December) ⁴⁶	
1-19-OVP	CTC of Special Allotment Release Order No. SARO-BMB-C-22-0012004 dated December 13, 2022	
1-20-OVP	CTC of Advice of NCA Issued dated December 13, 2022 signed by Amenah F. Pangandaman	
1-21-OVP	CTC of the Monthly Requirements Schedule (MRS) for Notice of Cash Allocation (NCA) for July to December, FY 2022 No. NCA-BMB-C-22-0016245	
1-22-OVP	CTC of the Obligation Request and Status – Office of the Vice President dated December 20, 2022	
1-23-OVP	CTC of the Physical and Financial Plan – CY 2022	
1-24-OVP	CTC of the (Revised) Accomplishment Report – Utilization of Confidential and Intelligence Funds for the period covering December 21 to December 31, 2022	
1-25-OVP	CTC of the Accomplishment Report – Utilization of Confidential and Intelligence Funds for the period covering December 21 to December 31, 2022	
1-26-OVP	CTC of the Memorandum for the President dated January 10, 2023	
1-27-OVP	CTC of the Letter dated January 10, 2023 addressed to Sen. Juan Miguel Zubiri	
1-28-OVP	CTC of the Letter dated January 10, 2023 addressed to Speaker Ferdinand Martin G. Romualdez	

⁴⁵ Annex A of Statement of Appropriations, Allotments, Obligations, Disbursements, and Balances as of August 31, 2022

⁴⁶ Annex B of Statement of Appropriations, Allotments, Obligations, Disbursements, and Balances as of August 31, 2022

1-29-OVP	CTC of the Letter dated April 3, 2023 addressed to Hon. Gamaliel A. Cordoba	Same as above.
1-30-OVP	CTC of the Liquidation Report No. 2023-03-31 dated March 29, 2023	
1-31-OVP	CTC of the Advice of Checks Issued and Cancelled dated January 31, 2023	
1-32-OVP	CTC of Landbank of the Philippines No. 0000244053 dated January 31, 2023 for the account of the Office the Vice President	
1-33-OVP	CTC of Disbursement Voucher No. 2023-01-00222 dated January 31, 2023	
1-34-OVP	CTC of the Certification dated March 30, 2023 signed by Gina F. Acosta as Special Disbursing Officer	
1-35-OVP	CTC of the Letter dated February 6, 2023 addressed to Marvin Joshua J. Palitic, Audit Team Leader, Office of the Vice President	
1-36-OVP	CTC of Special Order No. 2023-07 dated January 25, 2023	
1-37-OVP	CTC of the Confirmation Letter dated November 3, 2022 signed by Rosalia V. De Leon, Treasurer of the Philippines, through Lourdes Santos Tating	
1-38-OVP	CTC of the List of Bonded Accountable Public Officers	
1-39-OVP	CTC of the Authority to Accept Payment No. 13D1-2022-01612	
1-40-OVP	CTC of the List of Due and Demandable Accounts Payable – Advice to Debit Accounts	
1-41-OVP	CTC of the Letter dated January 17, 2023 addressed to the Chairperson of the Commission on Audit	
1-42-OVP	CTC of the Certification dated January 31, 2023 signed by Julieta L. Villadelrey	
1-43-OVP	CTC of the Specimen Signatures of Accountable Officers and the Officials Authorized to Sign the Liquidation Report (LR), Disbursement Voucher (DV) and Obligation Requests (OBR)	
1-44-OVP	CTC of the General Appropriations Act, FY 2023 for the Office of the Vice President	

1-45-OVP	CTC of the Summary of CY 2023 Appropriations	Same as above.
1-46-OVP	CTC of the Advice of NCA Issued Fund Cluster 01 dated January 3, 2023 signed by Amenah F. Pangandaman	
1-47-OVP	CTC of the Monthly Requirements Schedule (MRS) for Notice of Cash Allocation (NCA) for January to June, FY 2023	
1-48-OVP	CTC of the Obligation Request and Status No. 02-10110-2023-01-01479 dated January 31, 2023	
1-49-OVP	CTC of the Physical and Financial Plan, CY 2023	
1-50-OVP	CTC of the Accomplishment Report – Utilization of Confidential and Intelligence Funds No. 2023-01 dated March 30, 2023	
1-51-OVP	CTC of the Memorandum for the President dated April 3, 2023	
1-52-OVP	CTC of the Letter dated April 3, 2023 addressed to Sen. Juan Miguel Zubiri	
1-53-OVP	CTC of the Letter dated April 3, 2023 addressed to Speaker Ferdinand Martin G. Romualdez	
1-54-OVP	CTC of the Letter dated July 13, 2023 addressed to Hon. Gamaliel A. Cordoba	
1-55-OVP	CTC of Liquidation Report No. 2023-C7-133 dated July 11, 2023	
1-56-OVP	CTC of Landbank of the Philippines Check No. 0000245511 for the account of the Office of the Vice President	
1-57-OVP	CTC of Disbursement Voucher No. 2023-04-01791 dated April 10, 2023	
1-58-OVP	CTC of the Certification dated July 11, 2023 signed by Gina F. Acosta as Special Disbursing Officer	
1-59-OVP	CTC of the Letter dated April 24, 2023 addressed to Marvin Joshua J. Palitic, Audit Team Leader, Office of the Vice President	
1-60-OVP	CTC of Special Order No. 2023-32 dated April 3, 2023	
1-61-OVP	CTC of the Confirmation Letter dated November 3, 2022 signed by Rosalia V.	

	De Leon, Treasurer of the Philippines through Lourdes Santos Tating	Same as above.
1-62-OVP	CTC of the List of Bonded Accountable Public Officers	
1-63-OVP	CTC of the Authority to Accept Payment No. 13D1-2022-1612	
1-64-OVP	CTC of the List of Due and Demandable Accounts Payable – Advice to Debit Accounts	
1-65-OVP	CTC of the Letter dated April 3, 2023 addressed to Hon. Gamaliel A. Cordoba	
1-66-OVP	CTC of the Certification dated April 18, 2023 signed by Julieta L. Villadelrey	
1-67-OVP	CTC of the Specimen Signatures of Accountable Officers and the Officials Authorized to Sign the Liquidation Report (LR), Disbursement Voucher (DV) and Obligation Requests (OBR)	
1-68-OVP	CTC of the General Appropriations Act, FY 2023 for the Office of the Vice President	
1-69-OVP	CTC of the Summary of FY 2023 Appropriations	
1-70-OVP	CTC of the Advice of NCA Issued Fund Cluster 01 dated March 29, 2023 signed by Amenah F. Pangandaman	
1-71-OVP	CTC of the Monthly Requirements Schedule (MRS) for Notice of Cash Allocation (NCA) for January to December, FY 2023 No. NCA-BMB-C-23-0003855	
1-72-OVP	CTC of the Obligation Request and Status No. 02-101101-2023-04-12642 dated April 18, 2023	
1-73-OVP	CTC of the Physical and Financial Plan, CY 2023	
1-74-OVP	CTC of the Accomplishment Report – Utilization of Confidential and Intelligence Funds No. 2023-02 dated July 11, 2023	
1-75-OVP	CTC of the Memorandum for the President dated July 12, 2023	
1-76-OVP	CTC of the Letter dated July 12, 2023 addressed to Sen. Juan Miguel Zubiri	

1-77-OVP	CTC of the Letter dated July 12, 2023 addressed to Speaker Ferdinand Martin G. Romualdez	Same as above.
1-78-OVP	CTC of the Letter dated October 10, 2023 addressed to Hon. Gamaliel A. Cordoba	
1-79-OVP	CTC of Memorandum dated October 9, 2023	
1-80-OVP	CTC of Liquidation Report No. 2023-10-216 dated October 23, 2023	
1-81-OVP	CTC of Landbank of the Philippines Check No. 0000245664 for the account of the Office of the Vice President	
1-82-OVP	CTC of Disbursement Voucher No. 2023-07-04361 dated July 13, 2023	
1-83-OVP	CTC of the Certification dated October 9, 2023 signed by Gina F. Acosta as Special Disbursing Officer	
1-84-OVP	CTC of the Letter dated July 19, 2023 addressed to Marvin Joshua J. Palitic, Audit Team Leader, Office of the Vice President	
1-85-OVP	CTC of Special Order No. 2023-93 dated July 7, 2023	
1-86-OVP	CTC of the Confirmation Letter dated November 3, 2022	
1-87-OVP	CTC of the List of Bonded Accountable Public Officers	
1-88-OVP	CTC of the Authority to Accept Payment No. 1301-2022-01612	
1-89-OVP	CTC of the List of Due and Demandable Accounts Payable – Advice to Debit Accounts	
1-90-OVP	CTC of the Letter dated July 13, 2023 addressed to Hon. Gamaliel A. Cordoba	
1-91-OVP	CTC of Certification dated July 13, 2023	
1-92-OVP	CTC of the Specimen Signatures of Accountable Officers and the Officials Authorized to Sign the Liquidation Report (LR), Disbursement Voucher (DV) and Obligation Requests (OBR)	
1-93-OVP	CTC of the General Appropriations Act, FY 2023 for the Office of the Vice President	
1-94-OVP	CTC of the Summary of FY 2023 Appropriations	

1-95-OVP	CTC of the Advice of NCA Issued Fund Cluster 01 dated March 29, 2023	Same as above.
1-96-OVP	CTC of the Monthly Requirements Schedule (MRS) for Notice of Cash Allocation (NCA) for January to December, FY 2023 No. NCA-BMB-C-23-0003855	
1-97-OVP	CTC of the Obligation Request and Status No. 02-101101-2023-07-33139 dated July 13, 2023	
1-98-OVP	CTC of the Physical and Financial Plan, CY 2023	
1-99-OVP	CTC of the Accomplishment Report – Utilization of Confidential and Intelligence Funds No. 2023-02 dated October 9, 2023	
1-100-OVP	CTC of the Memorandum for the President dated October 10, 2023	
1-101-OVP	CTC of the Letter dated October 10, 2023 addressed to Sen. Juan Miguel Zubiri	
1-102-OVP	CTC of the Letter dated October 10, 2023 addressed to Speaker Ferdinand Martin G. Romualdez	
1-103-OVP	CTC of Audit Observation Memorandum No. 2023-211 dated September 14, 2023	
1-104-OVP	CTC of Audit Observation Memorandum No. 2023-213 dated October 3, 2023	
1-105-OVP	CTC of Audit Observation Memorandum No. 2024-014 dated February 1, 2024	
1-106-OVP	CTC of Audit Observation Memorandum No. 2024-170 dated August 8, 2024	
1-107-OVP	CTC of the Notice of Suspension No. 2023-001 dated December 13, 2023	
1-108-OVP	CTC of the Notice of Disallowance No. 2024-002 dated August 8, 2024	
1-109-OVP	CTC of the Letter dated October 19, 2023 addressed to Nilda B. Plaras in relation to AOM Nos. 2023-211 and 2023-213	
1-110-OVP	CTC of the Certification dated October 17, 2023 issued by Raymund Dante P. Lachica ⁴⁷	

⁴⁷ Attached to the Letter dated October 19, 2023

1-111-OVP	CTC of the Letter dated August 22, 2022 addressed to Hon. Amenah F. Pangandaman ⁴⁸	Same as above.
1-112-OVP	CTC of Office Order No. 2023-05 dated May 2, 2023 ⁴⁹	
1-113-OVP	CTC of Office Order No. 2022-14 dated July 18, 2022	
1-114-OVP and series	CTC of Acknowledgment Receipts for 4 th Quarter of 2022 ⁵⁰	
1-115-OVP and series	CTC of Letter dated April 19, 2024 addressed to Hon. Gamaliel A. Cordoba in relation to AOM No. 2024-014	
1-116-OVP and series	CTC of the Letter dated August 27, 2024 addressed to Hon. Gamaliel A. Cordoba in relation to AOM No. 2024-170	
1-117-OVP	Letter dated November 10, 2023 addressed to Hon. Gamaliel A. Cordoba in relation to AOM Nos. 2023-211 and 2023-213	
1-118-OVP	Letter dated November 22, 2023 addressed to Hon. Gamaliel A. Cordoba in relation to AOM Nos. 2023-211 and 2023-213	
1-119-OVP	Letter dated November 30, 2023 addressed to Hon. Gamaliel A. Cordoba in relation to AOM Nos. 2023-211 and 2023-213	
1-120-OVP	CTC of the Letter dated March 13, 2024 in relation to the Notice of Suspension No. 2023-001	
1-121-OVP	CTC of the List of Activities ⁵¹	
1-122-OVP	CTC of the Letter dated March 22, 2024, 2024 in relation to the Notice of Suspension No. 2023-001	
1-123-OVP	CTC of the Reconciliation of Confidential Expenses for 4 th Quarter CY 2022 ⁵²	
1-124-OVP	CTC of the Petition for Review dated February 3, 2025 in COA CP Case No. 2025-0194	Same as above, and to prove that:

⁴⁸ Attached to the Letter dated October 19, 2023

⁴⁹ Attached to the Letter dated October 19, 2023

⁵⁰ Attached to the Letter dated October 19, 2023

⁵¹ Attached to the Letter dated March 13, 2024

⁵² Attached to the Letter dated March 22, 2024

1-125-OVP	CTC of the Answer to the Petition for Review dated March 13, 2025 in COA CP Case No. 2025-0194	1. The findings in the Notice of Disallowance are not yet final; 2. Other matters related to the foregoing.
1-126-OVP	CTC of the Reply dated March 28, 2025 in COA CP Case No. 2025-0194	
1-127-OVP	Order dated February 6, 2025 in COA CP Case No. 2025-0194	
1-128-OVP	CTC of the Decision in COA CP Case No. 2025-0194	
1-129-OVP	Motion for Reconsideration in COA CP Case No. 2025-0194	
1-1-DE	CTC of the Cover letter for Submission dated April 4, 2023 addressed to the Chairperson of the Commission on Audit	To: 1. Disprove the allegations in the Articles of Impeachment; 2. Prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, misleading, and erroneous; 3. Establish that the respondent did not misuse, misappropriate, or irregularly liquidate confidential funds released to the Department of Education; 4. Prove the material allegations in the Answer dated May 26, 2026; and 5. Other matters related to the foregoing.
1-2-DE	CTC of the Liquidation Report dated March 31, 2023 for Period Covered February 20, 2023 – March 30, 2023	
1-3-DE	CTC of the Landbank Check dated February 20, 2023	
1-4-DE	CTC of the Disbursement Voucher dated February 20, 2023	
1-5-DE	CTC of the Disbursement Voucher dated February 20, 2023 (with note 1 st Qtr CY 2023)	
1-6-DE	CTC of the Certification for ₱37,500,000.00 dated March 31, 2023	
1-7-DE	CTC of the Cover letter for Submission dated February 21, 2023 addressed to the Audit Team Leader of the Commission on Audit	
1-8-DE	CTC of the Memorandum for ₱37,500,000.00 dated February 14, 2023	
1-9-DE	CTC of the Bureau of Treasury Confirmation Letter (re: Edward Fajarda's bond) dated January 27, 2023	
1-10-DE	CTC of the Bureau of Treasury Authority to Accept Payment (for Department of Education) dated January 27, 2023	
1-11-DE	CTC of the Landbank Oncoll Payment Slip (re: Fidelity Bond Fund for Department of Education) dated January 26, 2023	
1-12-DE	CTC of the Certification (re: Edward Fajarda) dated February 15, 2023	

1-13-DE	CTC of the Authorized Signatories (re: Edward Fajarda, Cholita F. Tiong, Sara Z. Duterte, Rhunna Catalan, Annalyn Sevilla)	Same as above.
1-14-DE	CTC of the Official Gazette Snippet (Vol. 118, No. 52) [re: Confidential Expenses]	
1-15-DE	CTC of the Letter Request dated February 1, 2023 addressed to Sec. Amenah Pangandaman, Department of Budget and Management (re: Special Allotment Release Order for ₱150,000,000.00)	
1-16-DE	CTC of the Special Allotment Release Order for ₱150,000,000.00 dated February 13, 2023	
1-17-DE	CTC of the Advice of NCA Issued addressed to Secretary, Department of Education (re: ₱15,904,508,000.00 covering RLIP requirements for January to March 2023)	
1-18-DE	CTC of the Monthly Requirements Schedule for Notice of Cash Allocation for January to June 2023 ⁵³	
1-19-DE	CTC of the Obligation Request and Status dated February 20, 2023 (re: ₱37,500,000.00)	
1-20-DE	CTC of the Physical and Financial Plan (Confidential Funds) CY 2023	
1-21-DE	CTC of the Accomplishment Report dated March 31, 2023 for Period Covered February 20 to March 30, 2023	
1-22-DE	CTC of the Memorandum for the President dated April 3, 2023 (re Accomplishment Report for period February 20 to March 30, 2023)	
1-23-DE	CTC of the Cover letter for Submission dated April 3, 2023 addressed to Sen. Juan Miguel Zubiri	
1-24-DE	CTC of the Cover letter for Submission dated April 3, 2023 addressed to Rep. Ferdinand Martin Romualdez	

⁵³ Annex A of 1-17-DE

1-25-DE	CTC of the Cover letter for Submission dated July 6, 2023 addressed to the Chairperson of the Commission on Audit	Same as above.
1-26-DE	CTC of the Liquidation Report dated June 30, 2023 for Period Covered April to June 30, 2023	
1-27-DE	CTC of the Advice of Checks Issued and Cancelled dated April 19, 2023 with Landbank Check dated April 19, 2023 (re P37,500,000.00)	
1-28-DE	CTC of Disbursement Voucher (with note 2 nd Qtr CY 2023) with receipt of payment date April 19, 2023	
1-29-DE	CTC of Disbursement Voucher (undated)	
1-30-DE	CTC of Certification for P37,500,000.00 dated June 30, 2023	
1-31-DE	CTC of Cover letter for Submission dated April 25, 2023 addressed to the Audit Team Leader of the Commission on Audit	
1-32-DE	CTC of the Memorandum for P37,500,000.00 (re Edward Fajarda's designation as Special Disbursing Officer) dated February 14, 2023	
1-33-DE	CTC of the Memorandum for P37,500,000.00 (re Edward Fajarda's designation as Special Disbursing Officer) dated April 3, 2023	
1-34-DE	CTC of the Bureau of Treasury Confirmation Letter (re: Edward Fajarda's bond) dated January 27, 2023	
1-35-DE	CTC of the Bureau of Treasury Authority to Accept Payment (for Department of Education) dated January 23, 2023	
1-36-DE	CTC of Landbank Oncoll Payment Slip (re: Fidelity Bond Fund for Department of Education) dated January 26, 2023	
1-37-DE	CTC of the Cover letter for Submission dated April 4, 2023 addressed to the Chairperson of the Commission on Audit	
1-38-DE	CTC of the Certification (re: Edward D. Fajarda with no unliquidated advances) dated April 3, 2023	
1-39-DE	CTC of the Certification (re: Edward D. Fajarda with no unliquidated advances) dated April 14, 2023	

1-40-DE	CTC of the Certification (re: Edward D. Fajarda with no unliquidated advances) dated June 30, 2023	Same as above.
1-41-DE	CTC of the Authorized Signatories (re: Edward Fajarda, Cholita F. Tiong, Sara Z. Duterte, Rhunna Catalan, Annalyn Sevilla)	
1-42-DE	CTC of the Official Gazette Snippet (Vol. 118, No. 52) [re: Confidential Expenses]	
1-43-DE	CTC of the Letter Request dated February 1, 2023 addressed to Sec. Amenah Pangandaman, Department of Budget and Management (re: Special Allotment Release Order for ₱150,000,000.00)	
1-44-DE	CTC of the Special Allotment Release Order for ₱150,000,000.00 dated February 13, 2023	
1-45-DE	CTC of the Advice of NCA Issued addressed to Secretary, Department of Education dated March 24, 2023 (re: ₱11,305,744,000.00) covering RLIP requirements for the second and third quarter of FY 2023)	Same as above, and in addition: 1. To prove that the Department of Education submitted required reports under Joint Circular No. 2015-01 for Second and Third Quarter, 2023; and 2. Other matters related to the foregoing.
1-46-DE	CTC of the Monthly Requirements Schedule for Notice of Cash Allocation for January to December, FY 2023 ⁵⁴	
1-47-DE	CTC of the Advice of NCA Issued addressed to Secretary, Department of Education (re: ₱15,904,508,000.00) covering RLIP requirements for January to March 2023)	
1-48-DE	CTC of the Monthly Requirements Schedule for Notice of Cash Allocation for January to June, FY 2023 ⁵⁵	
1-49-DE	CTC of the Obligation Request and Status dated April 19, 2023 (re: ₱37,500,000.00)	
1-50-DE	CTC of the Physical and Financial Plan (Confidential Funds) CY 2023 dated April 19, 2023	
1-51-DE	CTC of the Accomplishment Report dated June 30, 2023 for Period Covered April 20 to June 29, 2023	

⁵⁴ Annex A of 1-45-DE

⁵⁵ Annex A of 1-47-DE

1-52-DE	CTC of the Memorandum for the President dated July 5, 2023 (re Submission of Accomplishment Report of Department of Education on its use of Confidential Funds for the period of April 20 to June 29, 2023)	Same as above.
1-53-DE	CTC of the Cover letter for Submission dated July 5, 2023 addressed to Sen. Juan Miguel Zubiri	
1-54-DE	CTC of the Cover letter for Submission dated July 5, 2023 addressed to Rep. Ferdinand Martin Romualdez	
1-55-DE	Liquidation Report dated September 29, 2023 for Period Covered July – September 30, 2023	
1-56-DE	CTC of the Cover letter for Submission dated October 19, 2023 addressed to the Chairperson of the Commission on Audit	
1-57-DE	CTC of Landbank Check dated July 11, 2023	
1-58-DE	CTC of Disbursement Voucher dated June 30, 2023	
1-59-DE	CTC of the Certification for P37,500,000.00 dated October 2, 2023	
1-60-DE	CTC of the Cover letter for Submission dated July 13, 2023 addressed to the Audit Team Leader of the Commission on Audit	
1-61-DE	CTC of the Memorandum for P37,500,000.00 dated July 3, 2023 (re Authorization of Edward Fajarda to Secure Cash Advance)	
1-62-DE	CTC of the Bureau of Treasury Confirmation Letter (re: Edward Fajarda's bond) dated January 27, 2023 with "Received" stamp from Imelda Celso, Commission on Audit	
1-63-DE	CTC of the Bureau of Treasury Authority to Accept Payment (for Department of Education) dated January 23, 2023 with "Received" stamp from Imelda Celso, Commission on Audit	
1-64-DE	CTC of the Landbank Oncoll Payment Slip (re: Fidelity Bond Fund for Department of Education) dated January	

	26, 2023 with "Received" stamp from Imelda Celso, Commission on Audit	Same as above.
1-65-DE	CTC of the Cover letter for Submission dated July 6, 2023 addressed to the Chairperson of the Commission on Audit	
1-66-DE	CTC of the Certification (re: Edward Fajarda without unliquidated cash advances) dated June 30, 2023 with "Received" stamp from Imelda Celso, Commission on Audit	
1-67-DE	CTC of the Authorized Signatories (re: Edward Fajarda, Cholita F. Tiong, Sara Z. Duterte, Rhunna Catalan, Annalyn Sevilla)	
1-68-DE	CTC of the Official Gazette Snippet (Vol. 118, No. 52) [re: Confidential Expenses] found in page 376 of the Official Gazette	
1-69-DE	CTC of the Letter Request dated February 1, 2023 addressed to Sec. Amenah Pangandaman, Department of Budget and Management (re: Special Allotment Release Order for ₱150,000,000.00)	
1-70-DE	CTC of the Special Allotment Release Order for ₱150,000,000.00 dated February 13, 2023	
1-71-DE	CTC of the Advice of NCA Issued addressed to Secretary, Department of Education (re: ₱11,305,744,000.00 covering RLIP requirements for the second and third quarter of FY 2023) dated March 24, 2023	
1-72-DE	CTC of the Monthly Requirements Schedule for Notice of Cash Allocation for January to December, FY 2023 ⁵⁶	
1-73-DE	CTC of the Obligation Request and Status dated July 11, 2023 (re: ₱37,500,000.00)	
1-74-DE	CTC of the Physical and Financial Plan (Confidential Funds) CY 2023 dated July 3, 2023 with Physical Target and Budget for Second and Third Quarter	

⁵⁶ Annex A of 1-70-DE

1-75-DE	CTC of the Accomplishment Report dated September 30, 2023 for Period Covered July 12 to September 30, 2023	Same as above.
1-76-DE	CTC of the Memorandum for the President dated October 9, 2023 (re Accomplishment Report for period July 12 to September 30, 2023)	
1-77-DE	CTC of the Cover letter for Submission dated October 9, 2023 addressed to Sen. Juan Miguel Zubiri	
1-77-DE	CTC of the Cover letter for Submission dated October 9, 2023 addressed to Rep. Ferdinand Martin Romualdez	
1-78-DE and series	CTC of Acknowledgment Receipts for Purchase of Information (re Abuse Prevention and Control Within Schools) for First and Second Quarter, 2023	Same above, and in addition: 1. To prove that the Department of Education addressed and justified the findings of the Commission on Audit; and 2. To establish that the Department of Education provided supporting documents to the utilization of confidential funds; and 3. Other matters related to the foregoing.
1-79-DE	CTC of Reply to Audit Observation Memorandum No. 2024-015 dated April 17, 2024, addressed to Hon. Nilda B. Plaras, Intelligence and Confidential Funds Audit Office	
1-80-DE	CTC of YLS Certification dated December 5, 2023	
1-81-DE	CTC of YLS Certification dated December 30, 2023	
1-82-DE	CTC of YLS Certification dated January 1, 2024	
1-83-DE	CTC of Data on Joint 7ID-DepEd Anti-Insurgency Campaign from January 1, 2023 to December 2023 dated December 5, 2023	
1-84-DE	CTC of Letter from Adonis Bajao addressed to Undersecretary Nolasco A. Mempin	
1-85-DE	CTC of Recapitulation of Youth Leadership Summits 2023	
1-86-DE	CTC of DepEd Order No. 001, s. 2023 (Revised Designation of Undersecretaries and Assistant Secretaries to their Strands and Functional Areas of Responsibilities and Revised Signing Authorities) dated January 5, 2023	

1-87-DE	CTC of DepEd Reporting Structure ⁵⁷	Same as above.
1-88-DE	CTC of Revised Strand Assignments re: DepEd Representation to Inter-Agency Bodies, Boards, Councils and Committees ⁵⁸	
1-89-DE	CTC of Revised Signing Authorities ⁵⁹	
1-90-DE	CTC of National Performance Management Team ⁶⁰	
1-91-DE	CTC of Disbursement Voucher dated April 19, 2023 (with note 2 nd Qtr CY 2023 Allocation), stamped as "Received" by the DepEd of Accounting Division	
1-92-DE	CTC of Letter Response to Audit Observation Memorandum No. 2024-171 dated August 27, 2024	
1-93-DE	CTC of Letter Response to Audit Observation Memorandum No. 2024-171 dated August 22, 2024	
1-94-DE	CTC of YLS Certification dated December 12, 2023	
1-95-DE	CTC of certification on collaboration and partnership between the Task Force Davao, 10 Infantry Agila Division and Davao City Schools Divisions, and DepEd Region XI, among others, dated July 1, 2024	
1-96-DE	CTC of YLS Certification dated December 10, 2023	
1-97-DE	CTC of YLS Certification dated September 25, 2023	
1-98-DE	CTC of Physical and Financial Plan (Confidential Funds) CY 2023	
1-99-DE	CTC of Disbursement Voucher (with note "3 rd Qtr CY 2023 Allocation")	
1-100-DE	CTC of Credit Notice No. 2024-162 dated August 8, 2024	
1-101-DE and series	CTC of Acknowledgment Receipts, Anti-extremism/Terrorism Programs	
1-102-DE and series	CTC of Acknowledgment Receipts, Counter-insurgency Programs	

⁵⁷ Annex A of 1-114-DE

⁵⁸ Annex B of 1-114-DE

⁵⁹ Annex C of 1-114-DE

⁶⁰ Annex D of 1-114-DE

1-103-DE and series	CTC of Acknowledgment Receipts, Anti-illegal Activities Operations	Same as above.
1-104-DE and series	CTC of Acknowledgment Receipts, Abuse Prevention and Control within Schools	
1-105-DE and series	CTC of Acknowledgment Receipts, Transport Rental/Expenses	
1-106-DE and series	CTC of Acknowledgment Receipts, Purchase of Information (Policy)	
1-107-DE and series	CTC of Acknowledgment Receipts, Payment of Reward	
1-108-DE and series	CTC of Acknowledgment Receipts, Rental and Other Incidental Expenses	
1-109-DE and series	CTC of Acknowledgment Receipts, Purchase of Supplies	
1-1	Transcript of Stenographic Notes ("TSN") of the House of Representatives' Committee on Good Government and Public Accountability ("CGGPA") hearing on November 25, 2024 (as received from the HOR/COJ)	Same as those above.
1-2	OVP <i>Certification</i> dated January 10, 2022 (as received from the HOR/COJ)	
1-3	OVP <i>Certification</i> dated March 30, 2023 (as received from the HOR/COJ)	
1-4	OVP <i>Certification</i> dated July 11, 2023 (as received from the HOR/COJ)	
1-5	OVP <i>Certification</i> dated October 9, 2023 (as received from the HOR/COJ)	
1-6	DepEd <i>Certification</i> dated March 31, 2023 (as received from the HOR/COJ)	
1-7	DepEd <i>Certification</i> dated June 30, 2023 (as received from the HOR/COJ)	
1-8	DepEd <i>Certification</i> dated October 2, 2023 (as received from the HOR/COJ)	
1-9	COA's <i>Notice of Disallowance</i> dated March 31, 2026 (as received from the HOR/COJ)	
1-10	COA's <i>Decision</i> dated April 10, 2026 (as received from the HOR/COJ)	

1-11	TSN of CGGPA hearing on September 18, 2024 (as received from the HOR/COJ)	Same as those above.
1-12	TSN of CGGPA hearing on September 25, 2024 (as received from the HOR/COJ)	
1-13	TSN of CGGPA hearing on October 17, 2024 (as received from the HOR/COJ)	
1-14	TSN of CGGPA hearing on November 5, 2024 (as received from the HOR/COJ)	
1-15	TSN of CGGPA hearing on November 20, 2024 (as received from the HOR/COJ)	
1-16	TSN of CGGPA hearing on December 9, 2024 (as received from the HOR/COJ)	
1-17	TSN of CGGPA hearing November 11, 2024 (as received from the HOR/COJ)	
1-18	A copy each of the Land Bank of the Philippines ("LBP") Check No. 0000244027 dated December 20, 2022 (as received from the HOR/COJ)	
1-19	Disbursement Voucher ("DV") No. 2022-12-07222 dated December 20, 2022 (as received from the HOR/COJ)	
1-20	LBP Check No. 000244053 dated January 31, 2023 (as received from the HOR/COJ)	
1-21	DV No. 2023-01-00222 dated January 31, 2023 (as received from the HOR/COJ)	
1-22	LBP Check No. 000245511 dated April 18, 2023 (as received from the HOR/COJ)	
1-23	DV No. 2023-04-01791 dated April 10, 2023 (as received from the HOR/COJ)	
1-24	LBP Check No. 0000245664 dated July 13, 2023 (as received from the HOR/COJ)	
1-25	DV No. 2023-07-04361 dated July 13, 2023 (as received from the HOR/COJ)	
1-26	OVP Liquidation Report No. 2022-12-152 dated January 10, 2023 (as received from the HOR/COJ)	
1-27	OVP Updated Accomplishment Report for the period December 21 to 31, 2022 (as received from the HOR/COJ)	
1-28	OVP Undated Accomplishment Report for the period December 21 to 31, 2022 (as received from the HOR/COJ)	
1-29	Proof of submission dated January 10, 2023 to the Office of the President and	

	received on January 13, 2023 (as received from the HOR/COJ)	Same as those above.
1-30	Proof of Submission to Senate dated January 10, 2023 (as received from the HOR/COJ)	
1-31	Proof of Submission dated January 10, 2023 to the Speaker of the House of Representatives and received on January 13, 2023 (as received from the HOR/COJ)	
1-32	Liquidation Report No. 2023-03-31 dated March 29, 2023 (as received from the HOR/COJ)	
1-33	Proof of submission dated April 3, 2023 to the Office of the President (as received from the HOR/COJ)	
1-34	Proof of submission dated April 3, 2023 to the Senate President (as received from the HOR/COJ)	
1-35	Proof of submission dated April 3, 2023 to the Speaker of the House (as received from the HOR/COJ)	
1-36	OVP Accomplishment Report dated March 30, 2023 for the period February 6 to March 29, 2023 (as received from the HOR/COJ)	
1-37	Liquidation Report No. 2023-07-133 dated July 11, 2023 (as received from the HOR/COJ)	
1-38	Proof of submission dated July 12, 2023 to the Office of the President and received on July 12, 2023 (as received from the HOR/COJ)	
1-39	Proof of Submission dated July 12, 2023 to the Senate President and received on July 12, 2023 (as received from the HOR/COJ)	
1-40	Proof of Submission dated July 12, 2023 to the Speaker and received on July 12, 2023 (as received from the HOR/COJ)	
1-41	OVP Accomplishment Report dated July 11, 2023 for the period April 25 to June 30, 2023 (as received from the HOR/COJ)	

1-42	Liquidation Report No. 2023-10-216 dated October 23, 2023 (as received from the HOR/COJ)	Same as those above.
1-43	Proof of submission dated October 10, 2023 to the Office of the President and received on October 11, 2023 (as received from the HOR/COJ)	
1-44	Proof of submission dated October 10, 2023 to the Senate President and received on October 11, 2023 (as received from the HOR/COJ)	
1-45	Proof of Submission dated October 10, 2023 to the Speaker and received on October 12, 2023 (as received from the HOR/COJ)	
1-46	OVP Accomplishment Report dated October 9, 2023 for the period July 14 to September 30, 2023 (as received from the HOR/COJ)	
1-47	Documentary Evidence of Payments ("DEPS") with payee name "Milky Secuya" (as received from the HOR/COJ)	
1-48	Documentary Evidence of Payments ("DEPS") with payee name "Kokoy Villamin" (as received from the HOR/COJ)	
1-49	Documentary Evidence of Payments with payee "Mary Grace Piattos" (as received from the HOR/COJ)	
1-50	DEPs where the names of the payee are either unreadable, have incomplete names, are unsigned, have no names at all, or are undated (attached as Annex N to the Saballa, et al Impeachment Complaint) (as received from the HOR/COJ)	
1-51	DEPs showing the physical impossibility of actual disbursement (attached as Annex "O" to the Saballa, et al. Impeachment Complaint) (as received from the HOR/COJ)	
1-52	DEPs bearing dates within periods within which OVP had no Confidential Funds to be disbursed (attached as Annex "P" to the 3rd Impeachment	

	Complaint) (as received from the HOR/COJ)	Same as those above.
1-53	LBP Check No. 0000000453 dated February 20, 2023 (as received from the HOR/COJ)	
1-54	DV No. 23-02-2987 (as received from the HOR/COJ)	
1-55	LBP Check No. 0000000964 dated April 19, 2023 (as received from the HOR/COJ)	
1-56	Unnumbered and undated DV for 2nd Qtr. of CY 2023 (as received from the HOR/COJ)	
1-57	LBP Check No. 0000002250 dated July 11, 2023 (as received from the HOR/COJ)	
1-58	DV No. 23-07-10503 dated July 11, 2023 (as received from the HOR/COJ)	
1-59	Liquidation Report No. 2023-03-30 dated March 31, 2023 (as received from the HOR/COJ)	
1-60	Proof of submission dated April 3, 2023 to the Office of the President and received on April 11, 2023 (as received from the HOR/COJ)	
1-61	Proof of Submission dated April 3, 2023 to the Senate President and received on April 11, 2023 (as received from the HOR/COJ)	
1-62	Proof of submission dated April 31, 2023 to the Speaker of the House of Representatives and received on April 11, 2023 (as received from the HOR/COJ)	
1-63	DepEd Accomplishment Report dated March 31, 2023 for the period February 20 to March 30, 2023 (as received from the HOR/COJ)	
1-64	Liquidation Report No. 2023-06-30 dated June 30, 2023 (as received from the HOR/COJ)	
1-65	Proof of submission dated July 5, 2023 to the Office of the President and received on July 5, 2023 (as received from the HOR/COJ)	
1-66	Proof of Submission to Senate dated July 5, 2023 (as received from the HOR/COJ)	

1-67	Proof of Submission to Speaker dated July 5, 2023 (as received from the HOR/COJ)	Same as those above.
1-68	DepEd Accomplishment Report dated June 30, 2023 for the period April 20 to June 29, 2023 (as received from the HOR/COJ)	
1-69	Liquidation Report No. 2023-09-30 dated September 29, 2023 (as received from the HOR/COJ)	
1-70	Proof of Submission dated October 9, 2023 to the Office of the President and received on October 11, 2023 (as received from the HOR/COJ)	
1-71	Proof of Submission to Senate dated October 9, 2023 (as received from the HOR/COJ)	
1-72	Proof of Submission to Speaker dated October 9, 2023 (as received from the HOR/COJ)	
1-73	DepEd Accomplishment Report dated September 30, 2023 for the period July 12 to September 30, 2023 (as received from the HOR/COJ)	
1-74	Certification dated January 1, 2024 issued by Col. Manaros M. Boransing II of the 1st Infantry (Tabak) Division, Philippine Army (PA) for the success of the surveillance activities (as received from the HOR/COJ)	
1-75	Certification dated December 30, 2023 issued by Lieutenant Colonel Carlos B. Sangdaan Jr. of the 5th Infantry (Star) Division, PA for the success of the surveillance activities (as received from the HOR/COJ)	
1-76	Certification dated December 5, 2023 issued by Lieutenant Colonel Magtangol G. Panopio of the 7th Infantry (Kaugnay) Division, PA for the success of the surveillance activities (as received from the HOR/COJ)	
1-77	Undated letter to the Department of Education by the 9th Infantry (Spear) Division, PA, DepEd Order No. 001, s.	

	2023 dated January 9, 2023 on the Revised Designation of Undersecretaries and Assistant Secretaries to their Strands and Functional Areas of Responsibilities and Revised Signing Authorities (as received from the HOR/COJ)	Same as those above.
1-78	DV No. 23-04-5905 dated April 19, 2023	
1-79	Credit Notice No. 2024-162 dated August 8, 2024 (as received from the HOR/COJ)	
1-80	DEPs with signatures only (attached as Annex "W" to the 3 rd Impeachment Complaint) (as received from the HOR/COJ)	
1-81	DEPs showing physical impossibility of actual disbursement (attached as Annex "X" to the 3 rd Impeachment Complaint) (as received from the HOR/COJ)	
1-82	DEPs, different individuals, same signature (attached as Annex "Z" to the 3 rd Impeachment Complaint)	
1-83	DEPs with payee name "Alice Crecensio" (as received from the HOR/COJ)	
1-84	Notice of Disallowance No. 2024-002-100 (2022) dated August 8, 2024 (as received from the HOR/COJ)	
1-85	COA Letter in compliance with Subpoena Duces Tecum, dated August 21, 2024 (attached as Annex "K" to the 3 rd Impeachment Complaint) (as received from the HOR/COJ)	
1-86	OVP Letter to Chairman Cordoba, August 21, 2024 (as received from the HOR/COJ)	
1-87	Audit Observation Memorandum ("AOM") No. 2024-014 dated February 1, 2024 (as received from the HOR/COJ)	
1-88	AOM No. 2024-015 dated February 1, 2024 (as received from the HOR/COJ)	
1-89	Compliance letter dated April 19, 2024 in reference to AOM No. 2024-014 dated February 1, 2024 (as received from the HOR/COJ)	

1-90	Compliance letter dated April 17, 2024 in reference to AOM No. 2024-015 dated February 1, 2024 (as received from the HOR/COJ)	Same as those above.
1-91	Certification dated April 4, 2024 issued by Col. Raymund Dante P. Lachica with regard to the confidential activities performed by the OVP (as received from the HOR/COJ)	
1-92	DepEd Reply dated April 17, 2024 (as received from the HOR/COJ)	
1-93	AOM No. 2024-170 dated August 8, 2024 (as received from the HOR/COJ)	
1-94	AOM No. 2024-171 dated August 8, 2024 (as received from the HOR/COJ)	
1-95	NBI Questioned Documents Report No. 130-425 dated May 28, 2025 (as received from the HOR/COJ)	
1-96	Questioned Documents Report No. 302-724 dated May 28, 2025 (as received from the HOR/COJ)	
1-97	PSA Certification dated 08 December 2024 (as received from the HOR/COJ)	
1-98	PSA Certification dated 11 December 2024 (as received from the HOR/COJ)	
1-99	Ramil Madriaga's Affidavit dated November 29, 2025 (as received from the HOR/COJ)	Same as those above, and with Exhibit 4-20 and series.
1-100	Ramil Madriaga's Supplemental Affidavit dated April 11, 2026 (as received from the HOR/COJ)	
1-101	The Certification of Appearance dated April 7, 2026 (as received from the HOR/COJ)	
1-102	IBP ID of Atty. Cynthia P. Viñas-Pantoñal (as received from the HOR/COJ)	
1-103	IBP ID of Atty. Raymund P. Palad (as received from the HOR/COJ)	
1-104	Logbook containing Entry No. 001344 on November 29, 2025 (as received from the HOR/COJ)	
1-105	Photos of lawyer's visit to PDL Ramil Madriaga (as received from the HOR/COJ)	
1-106	Court Certification dated March 26, 2026	

1-107	Identification Cards of Ramil Madriaga (Driver's License and Philhealth ID) (as received from the HOR/COJ)	Same as above.
1-108	Oath of Office of Atty. Cynthia P. Viñas-Pantoñal dated December 11, 2023 (as received from the HOR/COJ)	
1-109	Certification by the Hon. Byron G. San Pedro, Executive Judge of the Regional Trial Court – Taguig City dated December 11, 2023 (as received from the HOR/COJ)	
1-110	CTC of Transcript of Stenographic Notes ⁶¹ of Committee on Good Government and Public Accountability's Hearing on September 18, 2024	Same as those above and those below.
1-111	CTC of TSN of Committee on Good Government and Public Accountability's Hearing on September 25, 2024	
1-112	CTC of TSN of Committee on Good Government and Public Accountability's Hearing on October 17, 2024	
1-113	CTC of TSN of Committee on Good Government and Public Accountability's Hearing on November 5, 2024	
1-114	CTC of TSN of Committee on Good Government and Public Accountability's Hearing on November 11, 2024	
1-115	CTC of TSN of Committee on Good Government and Public Accountability's Hearing on November 20, 2024	
1-116	CTC of TSN of Committee on Good Government and Public Accountability's Hearing on November 25, 2024	
1-117	CTC of TSN of Committee on Good Government and Public Accountability's Hearing on December 9, 2024	
1-118	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on March 2, 2026	
1-119	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on March 3, 2026	

⁶¹ Hereafter, "TSN"

1-120	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on March 4, 2026	Same as those above and those below.
1-121	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on March 18, 2026	
1-122	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on March 25, 2026	
1-123	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on April 14, 2026	
1-124	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on April 22, 2026	
1-125	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on April 29, 2026	
1-126	CTC of Transcript of Stenographic Notes of Committee on Justice's Hearing on May 4, 2026	
1-127	Committee on Good Government and Public Accountability's Committee Report No. 1503 dated June 10, 2025	
2-1	Printout of the screenshot of the AMLC's statement in 2017 posted on www.amlc.gov.ph denying that it was the source of the documents and information attached by Antonio F. Trillanes IV in his Complaint regarding the alleged bank accounts of former President Rodrigo Duterte before the Office of the Ombudsman.	To: 1. Disprove the allegations in the Articles of Impeachment; 2. Prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, misleading, and erroneous; 3. Establish that the respondent did not amass unexplained wealth;
2-2	Printout of the screenshot of BSP's statement on May 2, 2016 posted on www.amlc.gov.ph stating that the AMLC is not the source of the documents and information attached by Senator Antonio F. Trillanes, regarding alleged bank accounts of former President Rodrigo Duterte.	
2-3	AMLC Letter to the House of Representatives dated April 22, 2026 (as received from the HOR/COJ)	

2-4 and series	Summary of alleged CTRs from 2006 to 2025 for Sara Z. Duterte as submitted by the AMLC to the Committee on Justice (as received from the HOR/COJ)	4. Prove that the respondent fully and faithfully disclosed all her and her spouses' assets, liabilities, and net worth in her SALN; 5. Establish that respondent did not fail to divest nor did she willfully continue her business interests during her tenure as Vice President; 6. Prove the material allegations in the Answer dated May 26, 2026; and 7. Other matters related to the foregoing.
2-5 and series	Summary of alleged CTRs from 2006 to 2025 for Manases "Mans" R. Carpio as submitted by the AMLC to the Committee on Justice (as received from the HOR/COJ)	
2-6 and series	Summary of alleged STRs from 2006 to 2025 for Sara Z. Duterte as submitted by the AMLC to the Committee on Justice (as received from the HOR/COJ)	
2-7 and series	Summary of alleged STRs from 2006 to 2025 for Manases "Mans" R. Carpio as submitted by the AMLC to the Committee on Justice (as received from the HOR/COJ)	
2-8 and series	Alleged Financial Intelligence Reports on Vice President Sara Duterte-Carpio as submitted by the AMLC to the Committee on Justice (as received from the HOR/COJ)	
2-9 and series	Alleged Confidential Information Sharing or Investigation Reports as submitted by the AMLC to the Committee on Justice (as received from the HOR/COJ)	
2-10 and series	Former Senator Antonio Trillanes IV's <i>Sinumpaang Salaysay</i> dated April 21, 2026 and its annexes, as submitted by the AMLC to the Committee on Justice. (as received from the HOR/COJ)	
2-11 and series	Videos contained in the USB marked as Annex F ⁹ that was attached to Committee Report No. 261 and House Resolution 989. (as received from the HOR/COJ)	
2-12 and series	A copy each of Metro City Chow Foods Corp.'s Articles of Incorporation (as received from the HOR/COJ)	
2-13	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2018 (as received from the HOR/COJ)	
2-14	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2019 (as received from the HOR/COJ)	

2-15	Metro City Chow Foods Corp.'s General Information Sheets or the Year 2020 (as received from the HOR/COJ)	Same as above.
2-16	Metro City Chow Foods Corp.'s General Information Sheet for the Year 2021 (as received from the HOR/COJ)	
2-17	Metro City Chow Foods Corp.'s General Information Sheet for the Year 2022 (as received from the HOR/COJ)	
2-18	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2022 – Amended (as received from the HOR/COJ)	
2-19	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2023 (as received from the HOR/COJ)	
2-20	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2024 (as received from the HOR/COJ)	
2-21	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2025 (as received from the HOR/COJ)	
2-22	Metro City Chow Foods Corp.'s General Information Sheets for the Year 2025 – Amended (as received from the HOR/COJ)	
2-23	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2008 (as received from the HOR/COJ)	
2-24	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2009 (as received from the HOR/COJ)	
2-25	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2010 (as received from the HOR/COJ)	
2-26	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2011 (as received from the HOR/COJ)	
2-27	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2012 (as received from the HOR/COJ)	
2-28	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2013 (as received from the HOR/COJ)	
2-29	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2014 (as received from the HOR/COJ)	

2-30	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2015 (as received from the HOR/COJ)	Same as above.
2-31	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2016 (as received from the HOR/COJ)	
2-32	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2017 (as received from the HOR/COJ)	
2-33	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2018 (as received from the HOR/COJ)	
2-34	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2019 (May) (as received from the HOR/COJ)	
2-35	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2019 (June) (as received from the HOR/COJ)	
2-36	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2020 (as received from the HOR/COJ)	
2-37	City Hall King Chow Foods Corp.'s General Information Sheet for the Year 2021 (as received from the HOR/COJ)	
2-38	Gencorp Industries, Inc.'s General Information Sheet for the Year 2021 (as received from the HOR/COJ)	
2-39	Gencorp Industries, Inc.'s General Information Sheet for the Year 2022 (as received from the HOR/COJ)	
2-40	Gencorp Industries, Inc.'s General Information Sheet for the Year 2022 Amended (as received from the HOR/COJ)	
2-41	Gencorp Industries, Inc.'s General Information Sheet for the Year 2023 (as received from the HOR/COJ)	
2-42	Gencorp Industries, Inc.'s General Information Sheet for the Year 2024 (as received from the HOR/COJ)	
2-43	Gencorp Industries, Inc.'s General Information Sheet for the Year 2025 (as received from the HOR/COJ)	
2-44	Carpio Lawyers' Articles of Partnership	

	(as received from the HOR/COJ)	Same as above.
2-45	CALE88 FOODS Corp.'s General Information Sheets for the Year 2022 (as received from the HOR/COJ)	
2-46	CALE88 FOODS Corp.'s General Information Sheets for the Year 2022 (Amended) (Received September 2022) (as received from the HOR/COJ)	
2-47	CALE88 FOODS Corp.'s General Information Sheets for the Year 2022 (Amended) (Received February 2023) (as received from the HOR/COJ)	
2-48	CALE88 FOODS Corp.'s General Information Sheets for the Year 2023 (as received from the HOR/COJ)	
2-49	CALE88 FOODS Corp.'s General Information Sheets for the Year 2024 (as received from the HOR/COJ)	
2-50	CALE88 FOODS Corp.'s General Information Sheets for the Year 2025 (as received from the HOR/COJ)	
2-51	Certification of Non-Registration of Company for Madayaw Fisheries Corp. (as received from the HOR/COJ)	
2-52	Articles of Incorporation for Madayaw Fisheries Inc. (as received from the HOR/COJ)	
2-53	Mati City Ice Plant and Cold Storage Inc.'s GIS 2024 (as received from the HOR/COJ)	
2-54	Mati City Ice Plant and Cold Storage Inc.'s GIS 2025 (as received from the HOR/COJ)	
2-55	Mati City Ice Plant and Cold Storage Inc.'s GIS 2026 (as received from the HOR/COJ)	
2-56	Amianan Shores Inc AOI (as received from the HOR/COJ)	
2-57	Geometry Security Agency GIS 2023 (as received from the HOR/COJ)	
2-58	Geometry Security Agency GIS 2024 (as received from the HOR/COJ)	
2-59	Geometry Security Agency GIS 2025 (as received from the HOR/COJ)	

2-60	Cabletow 88 Shipping and Marine Services, Inc.'s Articles of Incorporation (as received from the HOR/COJ)	Same as above.
2-61	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2017 (as received from the HOR/COJ)	
2-62	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2018 (as received from the HOR/COJ)	
2-63	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2019 (as received from the HOR/COJ)	
2-64	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2020 (as received from the HOR/COJ)	
2-65	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2021 (as received from the HOR/COJ)	
2-66	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2022 (as received from the HOR/COJ)	
2-67	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2023 (as received from the HOR/COJ)	
2-68	Metro City Chow Foods Corp.'s Audited Financial Statements for the Year 2024 (as received from the HOR/COJ)	
2-69	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2007 (as received from the HOR/COJ)	
2-70	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2008 (as received from the HOR/COJ)	
2-71	City Hall King Chow Foods Corp.'s Audited Financial Statements for the	

	Year 2009 (as received from the HOR/COJ)	Same as above.
2-72	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2010 (as received from the HOR/COJ)	
2-73	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2011 (as received from the HOR/COJ)	
2-74	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2012 (as received from the HOR/COJ)	
2-75	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2013 (as received from the HOR/COJ)	
2-76	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2014 (as received from the HOR/COJ)	
2-77	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2015 (as received from the HOR/COJ)	
2-78	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2016 (as received from the HOR/COJ)	
2-79	City Hall King Chow Foods Corp.'s Audited Financial Statements for the Year 2017 (as received from the HOR/COJ)	
2-80	City Hall King Chow Foods Corp. Audited Financial Statements for the Year 2018 (as received from the HOR/COJ)	
2-81	City Hall King Chow Foods Corp. Audited Financial Statements for the Year 2019 (as received from the HOR/COJ)	
2-82	City Hall King Chow Foods Corp. Audited Financial Statements for the Year 2020 (as received from the HOR/COJ)	
2-83	Gencorp Industries, Inc.'s Audited Financial Statements for the years 2021 (as received from the HOR/COJ)	
2-84	Gencorp Industries, Inc.'s Audited	

	Financial Statements for the years 2022 (as received from the HOR/COJ)	Same as above.
2-85	Gencorp Industries, Inc.'s Audited Financial Statements for the years 2023 (as received from the HOR/COJ)	
2-86	GenCorp Industries, Inc.'s Audited Financial Statements for the years 2024	
2-87	CALE88 FOODS Corp.'s AFS for the year 2021 (as received from the HOR/COJ)	
2-88	CALE88 FOODS Corp.'s AFS for the year 2022 (as received from the HOR/COJ)	
2-89	CALE88 FOODS Corp.'s AFS for the year 2023 (as received from the HOR/COJ)	
2-90	Geometry Security and Investigation Agency, Inc.'s AFS for the year 2024 (as received from the HOR/COJ)	
2-91	Geometry Security and Investigation Agency, Inc.'s AFS for the year 2025 (as received from the HOR/COJ)	
3-1	Printout of ABS CBN News Article entitled "VP Duterte accuses Liza Marcos as power behind DepEd cash-filled envelopes" published November 23, 2024	To: 1. Disprove the allegations in the Articles of Impeachment; 2. Prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, misleading, and erroneous; 3. Establish that the respondent did not commit bribery, graft, and corruption; 4. Prove that the respondent did not give monetary gifts or payments to
3-2	Video of ANC Digital News labelled "PH Vice President, OVP Chief of Staff hold press conference amid house detention" uploaded on November 25, 2024	
3-3	Printout of Rappler News Article "Ex-DepEd official: Sara Duterte gifted cash, possibly to influence my decision" published on September 25, 2024	
3-4	Video of Rappler YouTube account entitled "Ex-DepEd official: Sara Duterte gifted cash, possibly to influence my decision" uploaded on September 25, 2024	
3-5	Video of Rappler YouTube account entitled "VP Sara Duterte reacts to accusations from ex-DepEd official Gloria Mercado" uploaded on September 25, 2024	

3-6	Gloria Jumamil-Mercado's Letter dated August 9, 2023	DepEd officials to allegedly induce violation or circumvention of procurement and other related laws 5. State the material allegations in the Answer dated May 26, 2026; and 6. Other matters related to the foregoing.
3-7	Video of ABS-CBN News YouTube account entitled "Sara Duterte chief of staff says VP ordered Mercado's resignation: 'I was instructed to call her'" uploaded on November 20, 2024	
3-8	ABS-CBN News Article entitled "Another DepEd official confirms getting cash during Sara Duterte's Term" published on October 17, 2024	
3-9	Video of Rappler YouTube account entitled "DepEd official Resty Osias says he, too, received envelopes with cash from Sara Duterte" uploaded on October 18, 2024	
3-10	PhilStar Global News Article entitled "Ex-DepEd officer confirms fund transfers to superintendents on VP Sara's orders published November 26, 2024"	
3-11	Affidavit of Extraction and Preservation	
3-12	Affidavit of Extraction	
4-1	The Official Statement of VP Sara Duterte on the Notice of Relief issued against all 75 personnel of the PNP Police and Security Group dated July 23, 2024	To: 1. Disprove the allegations in the Articles of Impeachment; 2. Prove that the allegations in the Articles of Impeachment are mere conclusions of law and fact, misleading, and erroneous; 3. Establish that the respondent did not contract for the assassination of the President, the
4-2	A USB containing the following videos: (Exhibits 4-2 to 4-8 below)	
4-3	Video uploaded by Manila Bulletin on November 23, 2024. FULL VIDEO: VP Sara Duterte holds an online press briefing. ⁶²	
4-4	Video uploaded by GMA Integrated News on November 26, 2024 ⁶³	
4-5	Video uploaded by GMA Integrated News on February 7, 2025 VP Sara Duterte denies making an assassination threat against the President. ⁶⁴	
4-6	Video uploaded by Harry Roque on Facebook	

⁶² <https://www.youtube.com/watch?v=mAdpG3nUhm8&t=467s>

⁶³ <https://www.youtube.com/watch?v=h8gaE4azqEo>

⁶⁴ <https://www.youtube.com/watch?v=4zaqK9WgFpc>

	VP Live: November 23, 2024 PressCon at the Batasan. ⁶⁵	First Lady, and the former Speaker of the House; 4. Prove that the respondent did not make grave threats; 5. Demonstrate that the respondent did not incite sedition against the Republic 6. Prove the material allegations in the Answer dated May 26, 2026; and 7. Other matters related to the foregoing.
4-7	Video uploaded by Manila Bulletin on October 19, 2024. ⁶⁶	
4-8	Video uploaded by ABS-CBN News on November 25, 2024. ⁶⁷	
4-9	Deactivation of Vice Presidential Protection Division dated August 14, 2024	
4-10	List of VPPD Personnel Downloaded to NCRPO as of July 22, 2024	
4-11	A USB containing the following video: (Exhibit 4-12 below)	
4-12	Video of BBM PODCAST: EPISODE 1 from the Bongbong Marcos YouTube Page ⁶⁸	
4-13	Letter from COA to Usec. Zuleika Lopez	
4-14	Certification dated February 18, 2026 from the Human Resource Management Office of the Davao City Government stating that Mr. Madriaga was never employed by it in any capacity	
4-15 and series	Vice President's Counter-Affidavit dated January 15, 2025 in NPS Docket No. XV-03-INV-24K-10806 and its annexes	
4-16 and series	Resolution dated January 17, 2025 in NPS Docket No. XV-03-INV-24K-10806	
4-17	Motion for Reconsideration with Motion to Inhibit dated February 7, 2025 in NPS Docket No. XV-03-INV-24K-10806	
4-18	Opposition dated February 19, 2025 in NPS Docket No. XV-03-INV-24K-10806	
4-19	Resolution dated March 6, 2025 in NPS Docket No. XV-03-INV-24K-10806	
4-20	Usec. Zuleika T. Lopez's Letter to Committee on Good Government and Public Accountability dated November 20, 2024	
4-21	Committee on Good Government and Public Accountability Letter-Response to	

⁶⁵ <https://www.facebook.com/HarryRoque/videos/417268981454224>

⁶⁶ <https://www.youtube.com/watch?v=LLkbhYY08zk>

⁶⁷ <https://www.abs-cbn.com/news/nation/2024/11/25/marcos-on-vp-sara-duterte-s-kill-threat-yan-ay-aking-papalagan-1337>

⁶⁸ https://www.youtube.com/watch?v=9_98v18GfNo

	Usec. Zuleika T. Lopez dated November 21, 2024	Same as above.
4-22	OVP's Letter to Committee on Good Government and Public Accountability dated November 21, 2024	
4-23	Committee on Good Government and Public Accountability Letter-Response to OVP dated November 21, 2024	
4-24	HOR SAA Letter to Committee on Good Government and Public Accountability dated November 22, 2024	
4-25	Usec. Zuleika T. Lopez's Motion for Reconsideration to Contempt Order dated November 20, 2024	
4-26	HOR's Contempt Order dated November 22, 2024	
4-27	HOR's Transfer Order dated November 22, 2024	
4-28	HOR's Release Order dated November 30, 2204	
4-20 and series	Investigation Data Form dated March 4, 2025, with attached Vice President's Complaint-Affidavit dated March 4, 2025 and its annexes in NPS-XV-16-INV-26C-00320	Same as Exhibits 1-1-OVP, 1-1-DE, Exhibit 4-1 , and in addition: 1. To prove that Ramil L. Madriaga is incredible, and that his testimony is hearsay, baseless, and self-serving to the prosecution's cause. 2. Other matters related to the foregoing.
4-21 and series	Vice President's Reply-Affidavit dated April 20, 2026 and its annexes in NPS-XV-16-INV-26C-00320	
4-22	Ramil L. Madriaga's Counter-Affidavit dated April 11, 2026 in NPS-XV-16-INV-26C-00320	
4-23	DND Memorandum dated June 22, 2022, approving the formation of the VPSPS	
4-24	AFP General Order No. 917 dated June 22, 2022 activating the VPSPG	
4-25	Certification from the Presidential Security Command dated February 11, 2026, certifying that Madriaga was never assigned, employed, or otherwise connected with the PSG	
4-26	Certification dated January 9, 2206 from the AFP Security and Protection Group with respect to Mr. Madriaga's non-connection with VPSPG	

4-27	Certification dated February 16, 2026 from OVP	Same as above.
4-28	Certification from DepEd dated February 27, 2026	
4-29	DepEd Memorandum dated January 17, 2023 from Vice President Sara directing Col. Lachica to designate Lt. Col. Nolasco as Security Officer	
4-30	LTO License Section Certification dated December 15, 2025 certifying that Mrs. Quilala's name does not exist in its database	
4-31	A printout of an Inquirer.net news article on Secretary Remulla's statement published on December 24, 2025	
4-32	Articles of Incorporation of the Philippine Security and Safety Professional Practitioners Association, Inc.	
4-33	Certification issued by the Department of Justice dated February 14, 2025	
4-34	Letter issued by the NBI dated February 11, 2015	
4-35	Certification issued by the Department of Justice dated February 5, 2025	
4-36	Videos containing all videos attached to House Resolution 989 and the Articles of Impeachment, and marked as Annex F ⁶⁹ (as received from the HOR/COJ)	
4-37	Affidavit of Investigation attached to House Resolution 989 and the Articles of Impeachment, and marked as Annex G ⁶⁹ (as received from the HOR/COJ)	
4-38	A USB containing the following videos: (Exhibit 4-39 to 4-45 below)	
4-39	Video uploaded by SOLIDPH News on April 12, 2026 ⁶⁹	
4-40	Video uploaded by One News on July 11, 2024 ⁷⁰	
4-41	Video uploaded by Channel 4d on Youtube dated January 29, 2024 ⁷¹	
4-42	OVP video of the November 23, 2024 Press Conference	

⁶⁹ https://youtu.be/1AM5N_qIFrU?si=uPlo_CzZUPJIMo9D

⁷⁰ https://www.youtube.com/shorts/WoDV9vf2_WU

⁷¹ <https://www.youtube.com/watch?v=D9Yk-7lc0Ho>

4-43	Video uploaded by ABS-CBN on November 26, 2024 ⁷²	Same as above.
4-44	Video uploaded by INQUIRER.net on October 18, 2024 ⁷³	
4-45	Video uploaded by ANC 24/7 Video on June 21, 2024 ⁷⁴	
4-46	Transcription of the video uploaded by SOLIDPH News on April 12, 2026	
4-47	Transcription of the video by One News on July 11, 2024	
4-48	Transcription of the video by Channel 4d on YouTube dated January 29, 2024	
4-49	Transcription of the video uploaded by Harry Roque on Facebook VP Live: November 23, 2024 PressCon at the Batasan marked as Exhibit 4-6	
4-50	Transcription of the video uploaded by ABS-CBN on November 26, 2024	
4-51	Transcription of the video uploaded by INQUIRER.net on October 18, 2024	
4-52	Transcription of the video uploaded by ANC 24/7 Video on June 21, 2024	
4-53	Affidavit of Extraction and Transcription	
4-54	Affidavit of Extraction	
4-55	A printout of a GMA News Online news article entitled "Enrile: No charge may be filed vs. Sara at this time for conditional threat" published on February 13, 2025	
4-56	A printout of a SunStar news article entitled "'No criminal charge' could be made vs Sara Duterte over kill remark" published on February 14, 2025	
4-57	A printout of a GMA News Online news article entitled "Palace dismisses destabilizing rumors vs Marcos admin" published on May 12, 2026	
4-58	A printout of the an Inquirer.net news article entitled "Sara Duterte: I won't grab Marcos' position" published on June 12, 2026	

⁷² <https://www.youtube.com/watch?v=h8gaE4azqEo>

⁷³ <https://www.youtube.com/watch?v=29SS-fO5vOg>

⁷⁴ <https://www.youtube.com/watch?v=braUQnIMVhg>

Pursuant to the Notice of Pre-Trial Conference dated June 9, 2026,⁷⁵ which expressly permits the parties to make reservation on documentary evidence not reasonably known or available during the pre-trial conference,⁷⁶ the respondent reserves the right to present the following documentary evidence:

- i. Titles, conveyance deeds, tax declarations, Certificates Authorizing Registration, and/or any and all documents evidencing ownership and payment of taxes, fees, and charges relating to properties declared in respondent's SALNs.
- ii. Other relevant documents, papers, contracts, and/or records, including but not limited to, special orders, appointment papers, office orders, contracts, billing statements, invoices, acknowledgement receipts, BIR submissions and/or forms, returns, financial statements, and statement of assets, liabilities, and net worth.
- iii. Identification, resumes, certificates, credentials, reports, opinions, and other related documents of expert witnesses and/or forensic accountants related or connected to their testimonies.
- iv. Other pleadings, submissions, orders, resolutions, judgment and/or decisions in relevant and related cases involving the respondent.
- v. Other documents, papers, and records relating to the incorporation, existence, operation, meetings, non-registration, non-operation, dissolution, closure, or retirement of business entities declared in respondent's SALN and/or to whom the respondent and her spouse has business interests, including but not limited to applications for retirement or closure of business with the Local Government Unit, and other agencies of the Government, as well as BIR submissions, AFSes, GISes, and other corporate documents such as secretary's certificates, minutes, and resolutions.
- vi. Other documentary, electronic, and/or object evidence, including but not limited to photographs and videos, to controvert, refute, and/or disprove any and all testimonial, object, and/or documentary evidence that will be presented by the prosecution during the course of trial, and/or will be presented by the respondent to prove her defenses.

Finally, the respondent reserves the right to present the foregoing exhibits and reserved documentary exhibits for purposes other than those stated above and in

⁷⁵ See Notice of Pre-Trial Conference dated June 9, 2026, p. 2

⁷⁶ *Id.*

accordance with the disclosure guidelines in the Notice of Pre-Trial Conference dated June 9, 2026.⁷⁷

Applicable Laws and Jurisprudence

The respondent shall rely on the Constitution, Revised Penal Code, the 2019 Revised Rules of Court, and other pertinent laws and jurisprudence.

Trial Dates

The respondent requests for at least thirty (30) trial dates for the presentation of her evidence-in-chief, on available calendar settings that this Honorable Court will set at the mutually agreed date and time of the parties.

Explanation of Service

A copy of this Pre-Trial Brief is being served upon the public prosecutors via electronic mail pursuant to the Notice of Pre-Trial Conference dated June 9, 2026 due to distance and time constraints which render personal service impractical and inefficient.

Respectfully submitted.

Makati City, June 15, 2026.

FORTUN NARVASA & SALAZAR

Counsel for Respondent Vice President Sara Z. Duterte
23rd Floor, Multinational Bancorporation Centre
6805 Ayala Avenue, City of Makati, 1226 Philippines
Telephone No. (63 2) 8812-8670
Email: info@fnslaw.com.ph

By:


PHILIP SIGFRIDO A. FORTUN

PTR No. 10765578; 01-05-2026; Makati City
IBP Lifetime No. 02049; 01-04-2001; Makati City Chapter
Roll of Attorneys No. 33041
MCLE Compliance Certificate No. IX-0000534; 09-16-2025


GREGORIO Y. NARVASA II

PTR No. 10765577; 01-05-2026; Makati City
IBP Lifetime No. 02050; 01-04-2001; Makati City Chapter
Roll of Attorneys No. 33985
MCLE Compliance Certificate No. VIII-0010474; 07-12-2024

⁷⁷ See Notice of Pre-Trial Conference dated June 9, 2026, p. 2

SHEILA C. SISON

PTR No. 10765569; 01-05-2026; Makati City
IBP No. 563591; 12-07-2025; Makati City Chapter
Roll of Attorneys No. 63457
MCLE Compliance Certificate No. VIII-0026330; 04-07-2025

KRISTINE R. FERRER

PTR No. 10764640; 01-05-2026; Makati City
IBP No. 017795; 03-22-2026; Davao City Chapter
Roll of Attorneys No. 58882
MCLE Compliance Certificate No. VIII-0033520; 05-14-2025

CARLO JOAQUIN T. NARVASA

PTR No. 10764642; 01-05-2026; Makati City
IBP Lifetime No. 1041301; 05-24-2016; Makati City Chapter
Roll of Attorneys No. 65977
MCLE Compliance Certificate No. VIII-0010473; 07-12-2024

JUSTIN NICOL B. GULAR

PTR No. 10764643; 01-05-2026; Makati City
IBP No. 586076; 01-04-2026; Makati City Chapter
Roll of Attorneys No. 83103
MCLE Compliance Certificate No. VIII-0007247; 03-13-2024

DAVID RONELL M. GOLLA VII

PTR No. 10764646; 01-05-2026; Makati City
IBP No. 559660; 11-18-2025; Makati City Chapter
Roll of Attorneys No. 88223
MCLE Compliance Certificate No. VIII-0007245; 03-13-2024

LINDON MIGUEL C. BACQUEL

PTR No. 10764645; 01-05-2026; Makati City
IBP No. 563283; 12-05-2025; Makati City Chapter
Roll of Attorneys No. 78001
MCLE Compliance Certificate No. VIII-0007218; 03-13-2024

KAROL GRACE G. OROCEO

PTR No. 10764647; 01-05-2026; Makati City
IBP No. 566500; 12-16-2025; Cebu City Chapter
Roll of Attorneys No. 76331
MCLE Compliance Certificate No. VIII-0007272; 03-13-2024

CLARLAINE F. RADO

PTR No. 10767907; 01-05-2026; Makati City
IBP No. 566501; 12-16-2025; Bohol Chapter
Roll of Attorneys No. 82840
MCLE Compliance Certificate No. VIII-0018111; 12-19-2024

FRANCESCA MARIE V. FLORES

PTR No. 10767910; 01-05-2026; Makati City
IBP No. 566505; 12-16-2025; Makati City Chapter
Roll of Attorneys No. 94764
MCLE Compliance in Progress (Passed 2024 Bar)

MIGUEL CARLOS A. FERNANDEZ

PTR No. 10767908; 01-05-2026; Makati City
IBP No. 558980; 11-14-2025; Makati City Chapter
Roll of Attorneys No. 95165
MCLE Compliance in Progress (Passed 2024 Bar)

MICHAEL WESLEY T. POA

PTR No. 10765709; 01-05-2026; Makati City
IBP No. 576111; 12-29-2025; Quezon City Chapter
Roll of Attorneys No. 73271
MCLE Compliance Certificate No. VIII-0023327; 02-27-2025

MARK C. VINLUAN

PTR No. 10767491; 01-07-2026; Makati City
IBP Lifetime No. 015777; 1-26-2017; Makati City Chapter
Roll of Attorneys No. 63019
MCLE Compliance Certificate No. VIII-0027818; 04-15-2025

RALPH B. BODOTA

PTR No. No. 5184435; 01-06-2026; Sta. Rosa City
IBP No. 515940; 11-03-2025; Catanduanes Chapter
Roll of Attorneys No. 71590
MCLE Compliance Certificate No. VIII-0008462; 05-04-2024

ROBERTO N. BATUNGBACAL

PTR No. No. 5187595; 01-12-2026; Sta. Rosa City
IBP No. 559615; 11-18-2025; Makati City Chapter
Roll of Attorneys No. 71590
MCLE Compliance Certificate No. VIII-0010421; 07-12-2024

Copy furnished:

The Prosecution Panel
House of Representatives
Batasang Pambansa Complex
Batasan Hills, Quezon City
[REDACTED]

4193-1-07

REPUBLIC OF THE PHILIPPINES)
MAKATI CITY)ss.

AFFIDAVIT OF SERVICE

I, **DAVID RONELL M. GOLLA VII**, of legal age, and subscribing under oath, depose and say:

1. I am an employee of the law firm of **FORTUN NARVASA & SALAZAR LAW OFFICES**, with business address at 23rd Floor, Multinational Bancorporation Centre, 6805 Ayala Avenue, Makati City;

2. On June 15, 2026, I served copies of "PRE-TRIAL BRIEF" in the case entitled "**IN THE MATTER OF: IMPEACHMENT TRIAL OF VICE PRESIDENT SARA ZIMMERMAN DUTERTE**" docketed as "**Case No. 004-2026**" before the **Senate of the Philippines, Pasay City, Impeachment Court**, in the following manner:

2.1 **The Prosecution Panel**
House of Representatives
Batasang Pambansa Complex
Batasan Hills, Quezon City
[REDACTED]

_____ by electronic mail.

Makati City, June 15, 2026.

[REDACTED]
DAVID RONELL M. GOLLA VII

SUBSCRIBED AND SWORN to before me this 15th day of June, 2026, affiant being personally known to me, exhibited his Philippine Passport No. P8329401B valid until November 28, 2031 as competent proof of his identity.

Doc. No. 365 ;
Page No. 78 ;
Book No. II ;
Series of 2026

4193-1-07

[REDACTED]
FRANCESCA MARIE V. FLORES
Notary Public of Makati
Appointment No. M-010
Commission until December 31, 2027
Roll of Attorneys No. 94764
PTR No. 10767910; 01-05-2026; Makati City
IBP No. 566505; 12-16-2025; Makati City Chapter
23F Multinational Bancorporation Centre
6805 Ayala Avenue, Makati City